



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Certified Mail No.

Activity No.: PER20060005  
Agency Interest No. 1251

Mr. David R. Rentrop  
Operations Director  
W. R. Grace & Co.-Conn.  
P.O. Box 3247  
Lake Charles, LA 70602

RE: Operating permit renewal/modification, Lake Charles Facility, W. R. Grace & Co.-Conn. –  
Davison Catalysts, Sulphur, Calcasieu Parish, Louisiana

Dear Mr. Rentrop:

This is to inform you that the permit renewal and modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_\_ of \_\_\_\_\_, 2012, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

Permit No.: 0520-00001-V9

Sincerely,

Chuck Carr Brown, Ph.D.  
Assistant Secretary  
CCB: TZG  
c: EPA Region VI

**ENVIRONMENTAL SERVICES**  
: PO BOX 4313, BATON ROUGE, LA 70821-4313  
P:225-219-3181 F:225-219-3309  
WWW.DEQ.LOUISIANA.GOV

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**W. R. GRACE & CO.-CONN.-DAVISON CATALYSTS, LAKE CHARLES FACILITY**  
**PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL AND MODIFICATION**

The LDEQ, Office of Environmental Services, is accepting written comments on a proposed Part 70 air operating permit renewal and modification for W. R. Grace & Co.-Conn.-Davison Catalysts, P. O. Box 3247, Lake Charles, LA 70602 for the Lake Charles Facility. **The facility is located at 1800 Davison Road in Sulphur, Calcasieu Parish.**

W. R. Grace & Co.-Conn. owns and operates the Grace Davison which is a petroleum catalysts manufacturing facility operating under Part 70 permit 0520-00001-V8 issued September 11, 2005.

W. R. Grace & Co.-Conn.-Davison Catalysts requested the renewal of its Part 70 air operating permit with minor modifications related to its emission points for the Lake Charles Facility.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	529.95	532.98	+3.03
SO <sub>2</sub>	0.28	1.20	+0.92
NO <sub>x</sub>	798.14	799.41	+1.27
CO	328.45	329.64	+1.19
VOC	10.02	10.05	+0.03
NH <sub>3</sub>	190.55	224.55	+34.00

The ammonia emission and other emission increases are mostly due to the inclusion of the emergency stack emissions that were not included in the previous permit.

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, May 24, 2007.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application, proposed permit and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m.,

Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

An additional copy may be reviewed at the Calcasieu Parish Library, Sulphur Regional Branch, 1160 Cypress Street, Sulphur, Louisiana 70663-5111.

Inquiries or requests for additional information regarding this permit action should be directed to Dr. Tingzong Guo, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3140.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [maillistrequest@ldeq.org](mailto:maillistrequest@ldeq.org) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the proposed permit and statement of basis** can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm).

**All correspondence should specify AI Number AI 1251, Permit Number 0520-00001-V9, and Activity Number PER20060005.**

Scheduled Publication Date: April 19, 2007

**AIR PERMIT BRIEFING SHEET  
PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**LAKE CHARLES FACILITY  
AGENCY INTEREST NO. 1251  
W. R. GRACE & CO.-CONN. – DAVISON CATALYSTS  
SULPHUR, CALCASIEU PARISH, LOUISIANA**

**I. Background**

Grace Davison, a division of W. R. Grace & Co. - Conn. (Grace), owns and operates a fluid cracking catalysts manufacturing facility under Part 70 Permit 0520-00001-V8 issued on September 11, 2005 and PSD Permit PSD-LA-610 issued on April 3, 1997. This is the Part 70 operating permit for the facility.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by W. R. Grace & Co. on July 21, 2006 requesting a Part 70 operating permit renewal and modification. Additional information dated December 21, 2006, January 26, 2007 and February 14, 2007 was also received.

**III. Description**

W. R. Grace manufactures fluid cracking catalysts at the Lake Charles Facility. W. R. Grace facility imports and does not produce minerals. The facility uses kaolin clay as a raw material to produce catalyst, but the facility does not do any additional processing of the kaolin clay. Using proprietary technology, the facility reacts various raw materials to produce alumina and silica-alumina slurries, which are washed free of contaminants, dried, stored in silos, and shipped in bulk by either rail or truck. The primary products are petroleum cracking catalysts of various grades. Emission sources include dust collectors (baghouses), a sodium silicate furnace, boilers, absorbers, and scrubbers.

*In the silica-alumina based catalyst process, sand and soda ash are thermally reacted in a silicate furnace to form a fused silicate glass. Silicate glass goes through dissolution to create sodium silicate. Sodium silicate is combined with kaolin clay, sodium aluminate, zeolite, and aluminum sulfate to form a silica gel. Silica gel is spray dried and the resulting product is then washed with water, ammonium sulfate, and rare earth chlorides. The catalyst then goes through a final drying process prior to being stored for shipment.*

*In the aluminum based catalyst (XP) process, kaolin clay is combined with hydrochloric acid, aluminum, and zeolite before being spray dried and calcined. The resulting product is then washed with ammonium sulfate and water. The catalyst cake then goes through a final drying process prior to being stored for shipment.*

*In the hydroprocessing (HP) catalyst process, nitric acid and solutions of nickel, molybdenum, and alumina are mixed and extruded, then dried and calcined into pellets. The catalyst is then*

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impregnated with nickel and molybdenum, dried and calcined again. The dried HP catalyst is stored in silos prior to shipment.

Selective catalytic reduction is used to control NO<sub>x</sub> emissions from the 7767 stack (Emission Point RLP004), which are generated by the base dryer, product dryer, base calciner, and from the conversion of nitric acid to NO<sub>x</sub> as part of the process. To further reduce NO<sub>x</sub> emissions, low NO<sub>x</sub> burners are utilized on the two dryers venting to the 7767 Stack. To ensure compliance with permitted limits a continuous NO<sub>x</sub> emission monitor is utilized on the 7767 Stack.

Throughout the process area, baghouses with designed control efficiencies of 99.9% are used to control catalyst dust. Nickel used in the process is impregnated on the catalyst. Since the nickel is impregnated on the catalyst, control of catalyst dust results in control of nickel emissions.

In the aluminum based catalyst (DA) process, dry clay is combined with alumina, zeolite, and rare earth chloride before being spray dried and calcined. The resulting product is cooled prior to being stored for shipment.

**Project**

With this renewal, the following modifications are proposed:

- Include the emergency emissions in the permit.
- Upgrade the dust collection devices for emission points EQT074 (4-87), EQT089 (5-87), EQT102 (6-87), EQT107 (7-87), EQT110 (8-87), and EQT116 (9-87), by replacing the existing cartridge filters with baghouses. The air flow is increasing due to a larger fan on each baghouse.
- Replace calciner and burners for EQT044 (2-91)
- Rebuild the Silicate Furnace for emission point EQT105 (7-73).
- Delete emission point 13-90.
- Update the following emission points with latest information.
  - Tank: EQT012 (1-03).
  - Vents: EQT038 (19-90) and EQT061 (3-79).
  - Boilers: EQT014 (1-76), EQT022 (1-96), EQT041 (2-76), EQT060 (3-76) and EQT065 (3-94).
  - Stack: EQT045 (2-93), EQT055 (28-90) and EQT058 (3-02).
  - Scrubbers: EQT029 (11-90) and EQT104 (6-93).
  - Absorber: EQT044 (2-91), EQT021 (1-93) and EQT112 (8-93).

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Dust control devices: EQT024 (1-99), EQT086 (48-90), EQT087 (49-90), EQT093 (50-90), EQT094 (51-90), EQT095 (52-90), EQT096 (53-90), EQT097 (54-90), EQT098 (55-90), EQT101 (6-83) and EQT100 (6-01).

The following existing sources that were not permitted before are added into this permit:

- EQT121 (1-06) 8283 Z-14 Calciner No. 1 Emergency Vent
- EQT122 (2-06) 8283A Z-14 Calciner No. 2 Emergency Vent
- EQT117 (3-06) 2071 Super D Cooling Tower
- EQT118 (4-06) 2055 Silicate Cooling Tower
- EQT119 (5-06) 2183 Air Compressor Cooling Tower
- EQT120 (6-06) 2774 HPC Cooling Tower

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	529.95	532.98	+3.03
SO <sub>2</sub>	0.28	1.20	+0.92
NO <sub>x</sub>	798.14	799.41	+1.27
CO	328.45	329.64	+1.19
VOC	10.02	10.05	+0.03

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
NH <sub>3</sub>	190.55	224.55	+34.00
Cl <sub>2</sub>	1.44	1.44	-
Co (and compounds)	0.33	0.33	-
Hydrazine	0.01	0.01	-
HCl	82.90	83.40	+0.50
Ni (and compounds)	0.52	0.52	-
HNO <sub>3</sub>	0.01	0.01	-
Zn (and compounds)	0.09	0.09	-
Total	275.85	310.35	+34.50

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The ammonia emission and other emission increases are mostly due to the inclusion of the emergency stack emissions that were not included in the previous permit.

**IV. Type of Review**

This permit was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility is a major source of toxic air pollutants (TAPs). Certification of Compliance No. CC92012 was approved for this facility on February 16, 1994. Ni and Co components are defined as Class I air toxic per LAC 33:III.5102. Nickel and Cobalt used in the hydroprocessing catalysts production process is impregnated on the catalyst. Since the nickel is impregnated on the catalyst, control of catalyst dust results in control of nickel emissions. Emissions of Ni and Co components shall be controlled by the baghouses (EQT026, EQT077, EQT113, EQT125 and RLP004) to 99.9% efficiency.

Although the Lake Charles Facility uses mineral products as raw materials for catalyst production, this facility does not process any minerals in its driers or calciners. The kaolin clay used in the Lake Charles Facility is processed in W. R. Grace's South Carolina Plant prior to being received in the Lake Charles Facility. In the Lake Charles Facility, the clay is simply mixed with other chemicals and reacts to form catalysts - prior to the catalyst being sent to driers and/or calciners. The catalysts are no longer "minerals" (or do not contain any minerals any more) since after the reactions the "naturally-occurring" substance forms (chemical compositions) in the original minerals have been lost (changed). The definition of "mineral processing" is silent with respect to the resultant product of the mixture of various substances with minerals which have reacted to form a new substance, in this case the catalyst. Since the catalyst is not a "mineral" by definition, the percentage of "minerals" in the catalyst production processes as raw materials is not needed to determine applicability. The aluminum and other metal products used in the Lake Charles Facility are in solution form and are not "minerals" by definition. Since the Lake Charles Facility does not process any minerals, it is not subject to the requirements of 40 CFR Part 60, Subpart UUU.

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg.

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8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Dispersion Model(s) Used: Not Applicable

**VIII. General Condition XVII Activities**

None

**IX. Insignificant Activities**

None

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

Emission Point	LAC 33:III.Chapter																	
	5 <sup>A</sup>	9	11	13	15	2103	2104*	2107	2111	2115	2116*	2122	22	29*	51*	53*	56	59*
GRP 3 (Facility wide)	1	1	1	1										1	1		1	1
GRP 4 (EQT 13, 59, 105)				1														
GRP 5 (EQT 14, 41, 60, 65)			1	1	1													
GRP 6 (EQT 11, 15-17, 19, 40, 43, 47, 63, 64, 66-69, 74-76, 78-87, 89, 90, 93-98, 101-103, 107, 110, 116)				1														
GRP 7 (EQT 20, 45, 72, 111)				1											1			
GRP 8 (EQT 10, 18, 23, 24, 31, 34, 37, 39, 49-54, 56, 62, 70, 88, 92, 99, 100, 106, 108, 109, 114)				1														
GRP 9 (EQT 25, 27, 33, 121, 122)				1														
GRP 10 (EQT 117-120)				1														
GRP 11 (EQT 22, 32)			1	1	1													
GRP 12 (EQT 44, 91)				1	1											1		
GRP 13 (EQT 28, 29, 36, 104, 115)																1		
EQT 46, 48				1														
EQT 42				1												1		

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Emission Point	LAC 33:III.Chapter																	
	5 <sup>▲</sup>	9	11	13	15	2103	2104*	2107	2111	2115	2116*	2122	29*	51*	53*	56	59*	
EQT 61			1	1														
EQT 57				1										1				
EQT 77, 113				1										1				
EQT 26, EQT 125, RLP 4				1										1				
EQT 73						1												
EQT 55				1	1									1				
EQT 105																		
EQT 21, 112				1	1									1				
EQT 12, 38, 58, 71 FUG 1-7																		1

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

1 -The regulations have applicable requirements that apply to this particular emission source.

-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled

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- but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
  - 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank -- The regulations clearly do not apply to this type of emission source.

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Emission Point	40 CFR 60 NSPS																40 CFR 63 NESHAP				40 CFR		
	40 CFR 60 NSPS																40 CFR 63 NESHAP				40 CFR		
	A	Ka	Kb	Db	Dc	CC	UUU	A	M	V	A	HH	SS	VV	DDDD	DDDD	64	68	82				
GRP 3 (Facility wide)						3		1	1		1							1	1	1			
GRP 4 (EQT 13, 59, 105)																							
GRP 5 (EQT 14, 41, 60, 65)															1								
GRP 6 (EQT 11, 15-17, 19, 40, 43, 47, 63, 64, 66-69, 74-76, 78-87, 89, 90, 93-98, 101-103, 107, 110, 116)																							
GRP 7 (EQT 20, 45, 72, 111)																							
GRP 8 (EQT 10, 18, 23, 24, 31, 34, 37, 39, 49-54, 56, 62, 70, 88, 92, 99, 100, 106, 108, 109, 114)																	1						
GRP 9 (EQT 25, 27, 33, 121, 122)																							
GRP 10 (EQT 117-120)																							
GRP 11 (EQT 22, 32)							1								1								
GRP 12 (EQT 44, 91)																							
GRP 13 (EQT 28, 29, 36, 104, 115)																							
EQT 46, 48																							
EQT 42																							

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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

Emission Point	40 CFR 60 NSPS						40 CFR 63 NESHAP				40 CFR								
	A	Ka	Kb	Db	Dc	CC	UUU	A	M	V	A	HH	SS	VV	DDDDD	64	68	82	
EQT 61																			
EQT 57																1			
EQT 77, 113																			
EQT 26, EQT 125, RLP 4																1			
EQT 73																			
EQT 55																	1		
EQT 105						3													
EQT 21, 112																			
EQT 12, 38, 58, 71 FUG 1-7																			

**KEY TO MATRIX**

1 -The regulations have applicable requirements that apply to this particular emission source.  
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

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3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
GRP 3 (Facility wide)	NSPS, Subpart UUU	DOES NOT APPLY. The facility does not produce and process any regulated minerals, it is not subject to the requirements of 40 CFR Part 60, Subpart UUU.
EQT 42	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5107 and 5113]	Class III TAPs - MACT is not required.
EQT 14, 41, 60, 65	NSPS, Subparts D, Db, Dc  NESHAP, Part 63 Subpart A - General Provisions [40 CFR 63.9(b)] NESHAP, Part 63 Subpart DDDDD - Industrial, Commercial, and institutional Boilers and Process Heaters MACT [40 CFR 63.7480-7575]	DOES NOT APPLY. Constructed before June 19, 1984, heat input < 250 MM Btu/hr  Subject to only the initial notification requirements in 40 CFR 63.9(b) per 40 CFR 63.7506(b).
EQT 72, 111, 20, 45	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5107 and 5113]	Class III TAPs - MACT is not required.
EQT 57	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5107 and 5113]	Class III TAPs - MACT is not required.
EQT 73	NSPS, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels [40 CFR 60.116b]	DOES NOT APPLY. Vessel volume is less than 40 cubic meters.

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ID No:	Requirement	
EQT 32, 22	NESHAP, Part 63 Subpart A - General Provisions [40 CFR 63.9(b)] NESHAP, Part 63 Subpart DDDDD - Industrial, Commercial, and institutional Boilers and Process Heaters MACT [40 CFR 63.7480-7575]	Subject to only the initial notification requirements in 40 CFR 63.9(b) per 40 CFR 63.7506(b).
EQT 105	NSPS, Subpart CC	DOES NOT APPLY. This furnace was constructed prior to June 15, 1979. The furnace was not subject to any reconstruction or modification since then.
EQT 55, 44, 91, 21, 112	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5107 and 5113]	Class III TAPs - MACT is not required.
FUG 4	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5107 and 5113]	Hydrazine emissions are less than MER. No MACT required.
EQT 36, 115, 28, 29, 38, 71, 104, 58, 12 FUG 1-3 FUG 5-7	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5107 and 5113]	Class III TAPs - MACT is not required.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**LAKE CHARLES FACILITY  
AGENCY INTEREST NO. 1251  
W. R. GRACE & CO.-CONN. - DAVISON CATALYSTS  
SULPHUR, CALCASIEU PARISH, LOUISIANA**

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

## 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
  2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and

## 40 CFR PART 70 GENERAL CONDITIONS

4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.  
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an

## 40 CFR PART 70 GENERAL CONDITIONS

emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]

- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
  4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
  5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

## 40 CFR PART 70 GENERAL CONDITIONS

3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
  - a. Report by June 30 to cover January through March
  - b. Report by September 30 to cover April through June
  - c. Report by December 31 to cover July through September
  - d. Report by March 31 to cover October through December
4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
  1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

## 40 CFR PART 70 GENERAL CONDITIONS

- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated July 21, 2006, December 21, 2006, January 26, 2007 and February 14, 2007.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June
    - 3. Report by December 31 to cover July through September
    - 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
  2. Cause of noncompliance;
  3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

**General Information**

**AI ID: 1251 W R Grace & Co - Conn - Davison Div Lake Charles Facility**  
**Activity Number: PER20060005**  
**Permit Number: 0520-00001-V9**  
**Air - Title V Regular Permit Renewal**

**Also Known As:**

ID	Name	User Group	Start Date
0520-0001	W R Grace & Co - Conn - Davison Div Lake Charles Facility	CDS Number	08-05-2002
0520-0001	W R Grace & Co - Conn - Davison Div Lake Charles Facility	Emission Inventory	03-01-2004
13-5114230	W R Grace & Co Conn Grace Davison	Federal Tax ID	11-21-1999
135114230	Federal Tax Id	Federal Tax ID	11-20-1999
FED 13 5114230	Federal Tax Identification Number	Federal Tax ID	11-21-1999
LAD008080434	W R Grace & Co Grace Davison	Hazardous Waste Notification	08-15-1983
LAD008080434	W R Grace & Co	Inactive & Abandoned Sites	11-01-1979
LA0001333	WPC File Number	LPDES Permit #	06-25-2003
WP1304	WPC State Permit Number	LWDPS Permit #	06-25-2003
	Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
	Radiation General License	Radiation License Number	01-07-2002
2153	X-Ray Registration Number	Radiation X-ray Registration Number	11-21-1999
GD-019-0876	W R Grace & Co	Solid Waste	01-08-2002
GD-019-0876	Solid Waste Facility No	Solid Waste Facility No.	12-15-1983
17903	W R Grace & Co Inc Sulphur	TEMPO Merge	11-18-2000
34606	W R Grace & Co Conn Grace Davison	TEMPO Merge	05-31-2001
44909	W R Grace & Co	TEMPO Merge	05-31-2001
7900	W R Grace & Co	TEMPO Merge	05-31-2001
0520-0001	Toxic Emissions Data Inventory #	Toxic Emissions Data Inventory #	01-01-1991
70663WRGRCDAVIS	TRI #	Toxic Release Inventory	07-09-2004
10-009903	UST Facility ID #	Underground Storage Tanks	10-11-2002

**Physical Location:**

1800 Davison Rd  
 Sulphur, LA 70663

**Main Phone:** 3375833510

**Mailing Address:**

PO Box 3247  
 Lake Charles, LA 706020000

**Location of Front Gate:**

30° 9' 23" 77 hundredths latitude, 93° 20' 18" 30 hundredths longitude, Coordinate Method: GPS Code (Fsuado Range) Differential, Coordinate Datum: NAD27

**Related People:**

Name	Mailing Address	Phone (Type)	Relationship
Jim Champagne	PO Box 3247 Lake Charles, LA 70602	3185832611 (WP)	Radiation Contact For
David Rentrop	PO Box 3247 Lake Charles, LA 70602	3375833511 (WP)	Responsible Official for
David Rentrop	PO Box 3247 Lake Charles, LA 70602	3375833511 (WP)	Employed by
David Rentrop	PO Box 3247 Lake Charles, LA 70602	3375833511 (WP)	Air Permit Contact For
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Responsible Official for

General Information

AI ID: 1251 W R Grace & Co - Conn - Davison Div Lake Charles Facility  
Activity Number: PER20060005  
Permit Number: 0520-00001-V9  
Air - Title V Regular Permit Renewal

Related People:

Name	Mailing Address	Phone (Type)	Relationship
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Haz. Waste Billing Party for
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Accident Prevention Billing Party for
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Water Billing Party for
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Solid Waste Billing Party for
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Employed by
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Underground Storage Tank Contact for
Gary Whitaker	P.O. Box 3247 Lake Charles, LA 70602	3375833510 (WP)	Air Permit Contact For

Related Organizations:

Name	Address	Phone (Type)	Relationship
WR Grace & Co	PO Box 3247 Lake Charles, LA 706023247	3376258463 (WP)	UST Billing Party for
WR Grace & Co	PO Box 3247 Lake Charles, LA 706023247	3376258463 (WP)	Owns
WR Grace & Co	PO Box 3247 Lake Charles, LA 706023247	3376258463 (WP)	Air Billing Party for
WR Grace & Co	PO Box 3247 Lake Charles, LA 706023247	3376258463 (WP)	Radiation Registration Billing Party for

SIC Codes: 2819, Industrial inorganic chemicals, nec

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to [facupdate@ia.gov](mailto:facupdate@ia.gov).

**INVENTORIES**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility  
 Activity Number: PER20060005  
 Permit Number: 0520-00001-V9  
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT010	1-01 - 6808 Baghouse on Dry Clay Hopper 1808			10 tons/hr		8760 hr/yr (All Year)
EQT011	1-02 - 6622 Baghouse on XP Blend Silo 1622			12 tons/hr		7488 hr/yr (All Year)
EQT012	1-03 - 1840 Ammonia Stripper Feed Tank	116000 gallons		100 tons/hr		8760 hr/yr (All Year)
EQT013	1-73 - 8101 Spray Dryer Stack			14 tons/hr		8760 hr/yr (All Year)
EQT014	1-76 - 8075A Steam Boiler			25700 ft <sup>3</sup> /hr		8760 hr/yr (All Year)
EQT015	1-79 - 6280 Dust Collector on Silo 1280			2.3 tons/hr		936 hr/yr (All Year)
EQT016	1-81 - 6100 Container Loading Dust Collector			20 tons/hr		260 hr/yr (All Year)
EQT017	1-87 - 6280A Dust Collector on Silo 1280A			10 tons/hr		156 hr/yr (All Year)
EQT018	1-89 - 6051 Dust Collector on Soda Ash Loading & Mixing			40 tons/hr		8760 hr/yr (All Year)
EQT019	1-90 - 6675 Dust Collector on XP Silo 1675			6.95 tons/hr		1456 hr/yr (All Year)
EQT020	1-92 - Baghouse 6288 on Z-14 Calciner			2.4 tons/hr		104 hr/yr (All Year)
EQT021	1-93 - 6233A Z-14 Ammonia Absorber No. 2			8.5 tons/hr		8760 hr/yr (All Year)
EQT022	1-96 - 8092 300 PSIG Steam Boiler			98000 ft <sup>3</sup> /hr		8760 hr/yr (All Year)
EQT023	1-97 - 6029 Dust Collector on Alumina Silo 1029			20 tons/hr		728 hr/yr (All Year)
EQT024	1-99 - 6086XY Dust Collectors on Sand/Soda Ash Bins 1086/A			20 tons/hr		8760 hr/yr (All Year)
EQT025	10-01 - 8820 Calciner Emergency Stack for DA Unit			9 tons/hr		260 hr/yr (All Year)
EQT026	10-96 - 6771 Baghouse on Milled Recycled Surge Bin 1771			2 tons/hr		8760 hr/yr (All Year)
EQT027	11-01 - 8640 XP Calciner Emergency Stack			7.4 tons/hr		104 hr/yr (All Year)
EQT028	11-87 - 6010 HCl Scrubber For Tank 1144			29.6 tons/hr		8760 hr/yr (All Year)
EQT029	11-90 - 6048 Scrubber on HCl Storage Tank 1048			22.1 tons/hr		8760 hr/yr (All Year)
EQT031	12-81 - 6013 Dust Collector Silo 1300			12 tons/hr		2496 hr/yr (All Year)
EQT032	12-96 - 8076 Steam Boiler (150 PSIG)			23800 ft <sup>3</sup> /hr		7488 hr/yr (All Year)
EQT033	12-96 - 8047 Base Calciner Emergency Stack			3 tons/hr		4 hr/yr (All Year)
EQT034	13-81 - 6014 Dust Collector on Clay Day Silo 1320			9 tons/hr		2912 hr/yr (All Year)
EQT036	13-96 - 6776 Nitric Acid Storage Tank Vent Scrubber			.1 tons/hr		52 hr/yr (All Year)
EQT037	14-90 - 8601 Dust Collector on NIK Silo 1601			12 tons/hr		4368 hr/yr (All Year)
EQT038	19-90 - 1614-B CX-100 Reactor's Vent			1.86 tons/hr		8760 hr/yr (All Year)
EQT039	2-01 - 6807 Baghouse on Dry Rare Earth Carbonate Hopper 1807	3000 gallons		3 tons/hr		8760 hr/yr (All Year)
EQT040	2-02 - 6622A Baghouse on XP Blend Silo 1622A			12 tons/hr		7488 hr/yr (All Year)
EQT041	2-76 - 8075 Steam Boiler			25700 ft <sup>3</sup> /hr		8760 hr/yr (All Year)
EQT042	2-78 - 8005 Spray Dryer Stack			27.76 tons/hr		8760 hr/yr (All Year)
EQT043	2-90 - 6675A Dust Collector on XP Silo 1675A			6.95 tons/hr		1456 hr/yr (All Year)
EQT044	2-91 - 6233 Z-14 Ammonia Absorber			7.6 tons/hr		8760 hr/yr (All Year)
EQT045	2-93 - 6282A Baghouse Stack (Z-14 Spray Dryer No. 2)			8.5 tons/hr		52 hr/yr (All Year)
EQT046	2-94 - 6501 CX Alumina Spray Cooler			3 tons/hr		8760 hr/yr (All Year)
EQT047	2-96 - 6728 Baghouse on Alumina Weigh Bin 1728			5 tons/hr		8760 hr/yr (All Year)

**INVENTORIES**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT048	2-97 - 6318W Scrubber on Oxalic Acid Mix Tank 1318			1 tons/hr		2080 hr/yr (All Year)
EQT049	22-90 - 6638 Dust Collector on Calciner Silo 1638			7.52 tons/hr		8760 hr/yr (All Year)
EQT050	23-90 - 6607 Raw Clay Unloading Transfer Receiver			12 tons/hr		4368 hr/yr (All Year)
EQT051	24-90 - 6606 Dust Collector on Raw Clay Silo 1606			24 tons/hr		8760 hr/yr (All Year)
EQT052	25-90 - 6602A NKC Unloading Transfer Receiver			6 tons/hr		5096 hr/yr (All Year)
EQT053	26-90 - 6070A Dust Collector on Z-14 Tank 1070			12 tons/hr		3744 hr/yr (All Year)
EQT054	27-90 - 6608 Dust Collector on Raw Clay Silo 1608			12 tons/hr		8760 hr/yr (All Year)
EQT055	28-90 - 1633 Stack on Scrubbers 6631 & 6644			20.4 tons/hr		8760 hr/yr (All Year)
EQT056	29-90 - 6025 Baghouse on Catalyst Air Slides			16.3 tons/hr		8760 hr/yr (All Year)
EQT057	3-01 - 8811 Spray Dryer / 8820 Calciner Scrubber Stack			25 tons/hr		8760 hr/yr (All Year)
EQT058	3-02 - 6408 HCl Fume Scrubber Emergency Stack			29.6 tons/hr		8760 hr/yr (All Year)
EQT059	3-73 - 8001B Spray Dryer Stack			14 tons/hr		8760 hr/yr (All Year)
EQT060	3-76 - 8175 Steam Boiler			21200 ft <sup>3</sup> /hr		8760 hr/yr (All Year)
EQT061	3-79 - 8259 Process Water Heater Vent (@ Z-14)			100 tons/hr		8760 hr/yr (All Year)
EQT062	3-87 - 6336 Dust Collector on Clay Silo 1300			6 tons/hr		2496 hr/yr (All Year)
EQT063	3-90 - 6675B Dust Collector on XP Silo 1675B			6.95 tons/hr		1456 hr/yr (All Year)
EQT064	3-91 - 6336A Dust Collector on Clay Silo 1300			6 tons/hr		2496 hr/yr (All Year)
EQT065	3-94 - 8500 CX-400 Steam Boiler (300 PSIG)			3960 ft <sup>3</sup> /hr		8760 hr/yr (All Year)
EQT066	36-90 - 6434 Baghouse on Catalyst Silo 1090			16.67 tons/hr		728 hr/yr (All Year)
EQT067	37-90 - 6435 Baghouse on Catalyst Silo 1090A			16.67 tons/hr		728 hr/yr (All Year)
EQT068	38-90 - 6436 Baghouse on Catalyst Silo 1090B			16.67 tons/hr		728 hr/yr (All Year)
EQT069	39-90 - 6437 Baghouse on Catalyst Silo 1090C			16.67 tons/hr		728 hr/yr (All Year)
EQT070	4-01 - 6814 Baghouse on Classifier Cyclone 6813			6.25 tons/hr		8760 hr/yr (All Year)
EQT071	4-76 - 1380 Filtrate Tank	50000 gallons		24 tons/hr		8760 hr/yr (All Year)
EQT072	4-78 - 6282 Baghouse Stack (Z-14 Spray Dryer)			7.6 tons/hr		104 hr/yr (All Year)
EQT073	4-79 - 1114 Gasoline Storage Tank (Submerged Fill Line)	1000 gallons		5.5 tons/hr		8760 hr/yr (All Year)
EQT074	4-87 - 6085 Baghouse on Silo 1085			16.3 tons/hr		416 hr/yr (All Year)
EQT075	4-90 - 6675C Dust Collector on XP Silo 1675C			6.95 tons/hr		1456 hr/yr (All Year)
EQT076	4-91 - 6337 Baghouse on Clay Unloading Dust			12 tons/hr		2496 hr/yr (All Year)
EQT077	4-96 - 6730 Baghouse on Recycle Day Bin 1730			5 tons/hr		8760 hr/yr (All Year)
EQT078	40-90 - 6438 Baghouse on Catalyst Silo 1438			16.67 tons/hr		728 hr/yr (All Year)
EQT079	41-90 - 6439 Baghouse on Catalyst Silo 1439			16.67 tons/hr		728 hr/yr (All Year)
EQT080	42-90 - 6440 Baghouse on Catalyst Silo 1440			16.67 tons/hr		728 hr/yr (All Year)
EQT081	43-90 - 6441 Baghouse on Catalyst Silo 1441			16.67 tons/hr		728 hr/yr (All Year)
EQT082	44-90 - 6442 Baghouse on Catalyst Silo 1442			16.67 tons/hr		728 hr/yr (All Year)
EQT083	45-90 - 6443 Baghouse on Catalyst Silo 1443			16.67 tons/hr		728 hr/yr (All Year)
EQT084	46-90 - 6444 Baghouse on Catalyst Silo 1444			16.67 tons/hr		728 hr/yr (All Year)

**INVENTORIES**

**AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility**

**Activity Number: PER20060005**

**Permit Number: 0520-00001-V9**

**Air - Title V Regular Permit Renewal**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT085	47-90 - 6445 Baghouse on Catalyst Silo 1445			16.67 tons/hr		728 hr/yr (All Year)
EQT086	48-90 - 6446 Baghouse on Catalyst Silo 1446			12 tons/hr		1092 hr/yr (All Year)
EQT087	49-90 - 6447 Baghouse on Catalyst Silo 1447			12 tons/hr		1092 hr/yr (All Year)
EQT088	5-01 - 6815 Baghouse on Calciner Feed Hopper 1815			10 tons/hr		8760 hr/yr (All Year)
EQT089	5-87 - 6085A Baghouse on Silo 1085A			16.3 tons/hr		416 hr/yr (All Year)
EQT090	5-90 - 6675D Dust Collector on XP Silo 1675D			6.95 tons/hr		1456 hr/yr (All Year)
EQT091	5-91 - 6655 Ammonia Absorber on XP Flash Dryer Baghouse 6672			6.95 tons/hr		7488 hr/yr (All Year)
EQT092	5-96 - 6725 & 6726 Baghouses on Alumina Unloading & Silo 1726			15 tons/hr		8760 hr/yr (All Year)
EQT093	50-90 - 6448 Baghouse on Catalyst Silo 1448			12 tons/hr		1092 hr/yr (All Year)
EQT094	51-90 - 6449 Baghouse on Catalyst Silo 1449			12 tons/hr		1092 hr/yr (All Year)
EQT095	52-90 - 6450 Baghouse on Catalyst Silo 1450			12 tons/hr		1092 hr/yr (All Year)
EQT096	53-90 - 6451 Baghouse on Catalyst Silo 1451			12 tons/hr		1092 hr/yr (All Year)
EQT097	54-90 - 6452 Baghouse on Catalyst Silo 1452			12 tons/hr		1092 hr/yr (All Year)
EQT098	55-90 - 6453 Baghouse on Catalyst Silo 1453			12 tons/hr		1092 hr/yr (All Year)
EQT099	56-90 - 6460 Baghouse on Catalyst Loading			65 tons/hr		5824 hr/yr (All Year)
EQT100	6-01 - 6842 Baghouse on DA Rare Earth Carbonate Silo 1842			10 tons/hr		8760 hr/yr (All Year)
EQT101	6-83 - 6087 Dust Collector on Reclaim Silo 1097			10 tons/hr		624 hr/yr (All Year)
EQT102	6-87 - 6085B Baghouse on Silo 1085B			16.3 tons/hr		416 hr/yr (All Year)
EQT103	6-90 - 6675E Dust Collector on XP Silo 1675E			6.95 tons/hr		1456 hr/yr (All Year)
EQT104	6-93 - 6021 Aqua Ammonia Tanks Vent Scrubber			3 lb/hr		2912 hr/yr (All Year)
EQT105	7-73 - 8090 Silicate Furnace Stack 8090A			6.67 tons/hr		8760 hr/yr (All Year)
EQT106	7-83 - 6157 Dust Collector on CP-3/CX-200 Tank 1157			10 tons/hr		1872 hr/yr (All Year)
EQT107	7-87 - 6085C Baghouse on Silo 1085C			16.3 tons/hr		416 hr/yr (All Year)
EQT108	7-90 - 6636 Baghouse on Classifier Cyclone 6635			4.11 tons/hr		8760 hr/yr (All Year)
EQT109	7-93 - 6087 Z-14 Unloading Transfer Receiver			10 tons/hr		6552 hr/yr (All Year)
EQT110	8-87 - 6085D Baghouse on Silo 1085D			10 tons/hr		416 hr/yr (All Year)
EQT111	8-90 - 6672 Baghouse on Flash Dryer 8671			16.3 tons/hr		104 hr/yr (All Year)
EQT112	8-93 - 6074 Catalyst Flash Dryers Ammonia Absorber			6.95 tons/hr		8760 hr/yr (All Year)
EQT113	8-96 - 6751 Baghouse on Impregnator Surge Bin 1751			29.6 tons/hr		8760 hr/yr (All Year)
EQT114	9-01 - 6607A Baghouse on Dry Clay Transfer			5 tons/hr		8760 hr/yr (All Year)
EQT115	9-83 - 6408 HCl Fume Scrubber Stack			10 tons/hr		8760 hr/yr (All Year)
EQT116	9-87 - 6085E Baghouse on Silo 1085E			29.6 tons/hr		8760 hr/yr (All Year)
EQT117	3-06 - 2071 Super D Cooling Tower			16.3 tons/hr		416 hr/yr (All Year)
EQT118	4-06 - 2055 Silicate Cooling Tower					8760 hr/yr (All Year)
EQT119	5-06 - 2183 Air Compressor Cooling Tower					8760 hr/yr (All Year)

**INVENTORIES**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
EQT120	6-06 - 2774 HPC Cooling Tower					8760 hr/yr (All Year)
EQT121	1-06 - 8283 Z-14 Calciner No.1 Emergency Vent			22 MM BTU/hr		156 hr/yr (All Year)
EQT122	2-06 - 8283A Z-14 Calciner No.2 Emergency Vent			40.2 MM BTU/hr		156 hr/yr (All Year)
EQT123	Milled Recycled Surge Bin 1771					8760 hr/yr (All Year)
EQT124	6769 SCR					8760 hr/yr (All Year)
EQT125	6764 Fugitive Dust Baghouse					8760 hr/yr (All Year)
EQT126	Base Dryer					8760 hr/yr (All Year)
EQT127	Product Dryer					8760 hr/yr (All Year)
EQT128	Calciner					8760 hr/yr (All Year)
EQT129	8769 SCR Heater and Process Emissions					8760 hr/yr (All Year)
EQT130	8001B Spray Dryer (Super D Catalyst Unit)					8760 hr/yr (All Year)
EQT131	8005 Spray Dryer (Super D Catalyst Unit)					8760 hr/yr (All Year)
EQT132	8101 Spray Dryer (Super D Catalyst Unit)					8760 hr/yr (All Year)
EQT133	8282 Spray Dryer (Z-14 Additives Unit No.1)					8760 hr/yr (All Year)
EQT134	8283 Calciner (Z-14 Additives Unit No.1)					8760 hr/yr (All Year)
EQT135	8282A Spray Dryer (Z-14 Additives Unit No.2)					8760 hr/yr (All Year)
EQT136	8283A Calciner (Z-14 Additives Unit No.2)					8760 hr/yr (All Year)
EQT137	8629 Spray Dryer (XP Catalyst Unit)					8760 hr/yr (All Year)
EQT138	8640 Calciner (XP Catalyst Unit)					8760 hr/yr (All Year)
EQT139	8747 Calciner (HPC Unit)					8760 hr/yr (All Year)
EQT140	8811 Spray Dryer (DA Catalyst Unit)					8760 hr/yr (All Year)
EQT141	8820 Calciner (DA Catalyst Unit)					8760 hr/yr (All Year)
FUG001	F-23 - Fugitives (DA area)					8760 hr/yr (All Year)
FUG002	F11 - Fugitives (Super D Area)					8760 hr/yr (All Year)
FUG003	F12 - Fugitives (HPC Area)					8760 hr/yr (All Year)
FUG004	F13 - Fugitives (HPC Area)					8760 hr/yr (All Year)
FUG005	F2 - Fugitives (Z-14 Area)					8760 hr/yr (All Year)
FUG006	F21 - Fugitives (Product Silos Area)					8760 hr/yr (All Year)
FUG007	F22 - Fugitives (Ammonia Unloading Area)					8760 hr/yr (All Year)
RLP004	11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse			1 tons/hr		8760 hr/yr (All Year)

**Subject Item Groups:**

ID	Description	Included Components (from Above)
GRP003	Davison Catalyst	EQT100 6-01 - 6842 Baghouse on DA Rare Earth Carbonate Silo 1842
GRP003	Davison Catalyst	EQT101 6-83 - 6097 Dust Collector on Reclaim Silo 1097
GRP003	Davison Catalyst	EQT102 6-87 - 6085B Baghouse on Silo 1085B

**INVENTORIES**

**AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility**

**Activity Number: PER20060005**

**Permit Number: 0520-00001-V9**

**Air - Title V Regular Permit Renewal**

Subject Item Groups:		Included Components (from Above)	
ID	Description		
GRP003	Davison Catalyst	EQT103	6-90 - 6675E Dust Collector on XP Silo 1675E
GRP003	Davison Catalyst	EQT104	6-93 - 6021 Aqua Ammonia Tanks Vent Scrubber
GRP003	Davison Catalyst	EQT105	7-73 - 8090 Silicate Furnace Stack 8090A
GRP003	Davison Catalyst	EQT106	7-83 - 6157 Dust Collector on CP-3/CX-200 Tank 1157
GRP003	Davison Catalyst	EQT107	7-87 - 6085C Baghouse on Silo 1085C
GRP003	Davison Catalyst	EQT108	7-90 - 6636 Baghouse on Classifier Cyclone 6635
GRP003	Davison Catalyst	EQT109	7-93 - 6087 Z-14 Unloading Transfer Receiver
GRP003	Davison Catalyst	EQT110	8-87 - 6085D Baghouse on Silo 1085D
GRP003	Davison Catalyst	EQT111	8-90 - 6672 Baghouse on Flash Dryer 8671
GRP003	Davison Catalyst	EQT112	8-93 - 6074 Catalyst Flash Dryers Ammonia Absorber
GRP003	Davison Catalyst	EQT113	8-96 - 6751 Baghouse on Impregnator Surge Bin 1751
GRP003	Davison Catalyst	EQT114	9-01 - 6607A Baghouse on Dry Clay Transfer
GRP003	Davison Catalyst	EQT115	9-83 - 6408 HCl Fume Scrubber Stack
GRP003	Davison Catalyst	EQT116	9-87 - 6085E Baghouse on Silo 1085E
GRP003	Davison Catalyst	EQT117	3-06 - 2071 Super D Cooling Tower
GRP003	Davison Catalyst	EQT118	4-06 - 2055 Silicate Cooling Tower
GRP003	Davison Catalyst	EQT119	5-06 - 2183 Air Compressor Cooling Tower
GRP003	Davison Catalyst	EQT120	6-06 - 2774 HPC Cooling Tower
GRP003	Davison Catalyst	EQT121	1-06 - 8283 Z-14 Calciner No.1 Emergency Vent
GRP003	Davison Catalyst	EQT122	2-06 - 8283A Z-14 Calciner No.2 Emergency Vent
GRP003	Davison Catalyst	EQT123	Milled Recycled Surge Bin 1771
GRP003	Davison Catalyst	EQT124	6769 SCR
GRP003	Davison Catalyst	EQT125	6764 Fugitive Dust Baghouse
GRP003	Davison Catalyst	EQT126	Base Dryer
GRP003	Davison Catalyst	EQT127	Product Dryer
GRP003	Davison Catalyst	EQT128	Calciner
GRP003	Davison Catalyst	EQT129	8769 SCR Heater and Process Emissions
GRP003	Davison Catalyst	EQT130	8001B Spray Dryer (Super D Catalyst Unit)
GRP003	Davison Catalyst	EQT131	8005 Spray Dryer (Super D Catalyst Unit)
GRP003	Davison Catalyst	EQT132	8101 Spray Dryer (Super D Catalyst Unit)
GRP003	Davison Catalyst	EQT133	8282 Spray Dryer (Z-14 Additives Unit No.1)
GRP003	Davison Catalyst	EQT134	8283 Calciner (Z-14 Additives Unit No.1)
GRP003	Davison Catalyst	EQT135	8282A Spray Dryer (Z-14 Additives Unit No.2)
GRP003	Davison Catalyst	EQT136	8283A Calciner (Z-14 Additives Unit No.2)
GRP003	Davison Catalyst	EQT137	8629 Spray Dryer (XP Catalyst Unit)
GRP003	Davison Catalyst	EQT138	8640 Calciner (XP Catalyst Unit)
GRP003	Davison Catalyst	EQT139	8747 Calciner (HPC Unit)

**INVENTORIES**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

Subject Item Groups:		Description	Included Components (from Above)
GRP003	Davison Catalyst	EQT140 8811 Spray Dryer (DA Catalyst Unit)	
GRP003	Davison Catalyst	EQT141 8820 Calciner (DA Catalyst Unit)	
GRP003	Davison Catalyst	FUG1 F-23 - Fugitives (DA area)	
GRP003	Davison Catalyst	FUG2 F11 - Fugitives (Super D Area)	
GRP003	Davison Catalyst	FUG3 F12 - Fugitives (HPC Area)	
GRP003	Davison Catalyst	FUG4 F13 - Fugitives (HPC Area)	
GRP003	Davison Catalyst	FUG5 F2 - Fugitives (Z-14 Area)	
GRP003	Davison Catalyst	FUG6 F21 - Fugitives (Product Silos Area)	
GRP003	Davison Catalyst	FUG7 F22 - Fugitives (Ammonia Unloading Area)	
GRP003	Davison Catalyst	EQT26 10-96 - 6771 Baghouse on Milled Recycled Surge Bin 1771	
GRP003	Davison Catalyst	EQT25 10-01 - 8820 Calciner Emergency Stack for DA Unit	
GRP003	Davison Catalyst	EQT24 1-99 - 6086XY Dust Collectors on Sand/Soda Ash Bins 1086/A	
GRP003	Davison Catalyst	EQT23 1-97 - 6029 Dust Collector on Alumina Silo 1029	
GRP003	Davison Catalyst	EQT22 1-96 - 8092 300 PSIG Steam Boiler	
GRP003	Davison Catalyst	EQT21 1-93 - 6233A Z-14 Ammonia Absorber No. 2	
GRP003	Davison Catalyst	EQT20 1-92 - Baghouse 6288 on Z-14 Calciner	
GRP003	Davison Catalyst	EQT19 1-90 - 6675 Dust Collector on XP Silo 1675	
GRP003	Davison Catalyst	EQT18 1-89 - 6051 Dust Collector on Soda Ash Loading & Mixing	
GRP003	Davison Catalyst	EQT53 26-90 - 6070A Dust Collector on Z-14 Tank 1070	
GRP003	Davison Catalyst	EQT52 25-90 - 6602A NKC Unloading Transfer Receiver	
GRP003	Davison Catalyst	EQT51 24-90 - 6606 Dust Collector on Raw Clay Silo 1606	
GRP003	Davison Catalyst	EQT50 23-90 - 6607 Raw Clay Unloading Transfer Receiver	
GRP003	Davison Catalyst	EQT49 22-90 - 6638 Dust Collector on Calciner Silo 1638	
GRP003	Davison Catalyst	EQT48 2-97 - 6318W Scrubber on Oxalic Acid Mix Tank 1318	
GRP003	Davison Catalyst	EQT47 2-96 - 6728 Baghouse on Alumina Weigh Bin 1728	
GRP003	Davison Catalyst	EQT46 2-94 - 6501 CX Alumina Spray Cooler	
GRP003	Davison Catalyst	EQT45 2-93 - 6282A Baghouse Stack (Z-14 Spray Dryer No. 2)	
GRP003	Davison Catalyst	EQT44 2-91 - 6233 Z-14 Ammonia Absorber	
GRP003	Davison Catalyst	EQT43 2-90 - 6675A Dust Collector on XP Silo 1675A	
GRP003	Davison Catalyst	EQT42 2-78 - 8005 Spray Dryer Stack	
GRP003	Davison Catalyst	EQT41 2-76 - 8075 Steam Boiler	
GRP003	Davison Catalyst	EQT40 2-02 - 6622A Baghouse on XP Blend Silo 1622A	
GRP003	Davison Catalyst	EQT39 2-01 - 6807 Baghouse on Dry Rare Earth Carbonate Hopper 1807	
GRP003	Davison Catalyst	EQT38 19-90 - 1614-B CX-100 Reactor's Vent	
GRP003	Davison Catalyst	EQT37 14-90 - 6601 Dust Collector on NKC Silo 1601	
GRP003	Davison Catalyst	EQT36 13-96 - 6776 Niiric Acid Storage Tank Vent Scrubber	
GRP003	Davison Catalyst	EQT34 13-81 - 6014 Dust Collector on Clay Day Silo 1320	

**INVENTORIES**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**Subject Item Groups:**

ID	Description	Included Components (from Above)
GRP003	Davison Catalyst	EQT33 12-96 - 8747 Base Calciner Emergency Stack
GRP003	Davison Catalyst	EQT32 12-90 - 8076 Steam Boiler (150 PSIG)
GRP003	Davison Catalyst	EQT31 12-81 - 6013 Dust Collector Silo 1300
GRP003	Davison Catalyst	EQT29 11-90 - 6048 Scrubber on HCl Storage Tank 1048
GRP003	Davison Catalyst	EQT28 11-87 - 6010 HCl Scrubber For Tank 1144
GRP003	Davison Catalyst	EQT27 11-01 - 8640 XP Calciner Emergency Stack
GRP003	Davison Catalyst	EQT17 1-87 - 6280A Dust Collector on Silo 1280A
GRP003	Davison Catalyst	EQT16 1-81 - 6100 Container Loading Dust Collector
GRP003	Davison Catalyst	EQT15 1-79 - 6280 Dust Collector on Silo 1280
GRP003	Davison Catalyst	EQT14 1-76 - 8075A Steam Boiler
GRP003	Davison Catalyst	EQT13 1-73 - 8101 Spray Dryer Stack
GRP003	Davison Catalyst	EQT12 1-03 - 1840 Ammonia Stripper Feed Tank
GRP003	Davison Catalyst	EQT11 1-02 - 6622 Baghouse on XP Blend Silo 1622
GRP003	Davison Catalyst	EQT10 1-01 - 6808 Baghouse on Dry Clay Hopper 1808
GRP003	Davison Catalyst	EQT99 56-90 - 6460 Baghouse on Catalyst Loading
GRP003	Davison Catalyst	EQT98 55-90 - 6453 Baghouse on Catalyst Silo 1453
GRP003	Davison Catalyst	EQT97 54-90 - 6452 Baghouse on Catalyst Silo 1452
GRP003	Davison Catalyst	EQT96 53-90 - 6451 Baghouse on Catalyst Silo 1451
GRP003	Davison Catalyst	EQT95 52-90 - 6450 Baghouse on Catalyst Silo 1450
GRP003	Davison Catalyst	EQT94 51-90 - 6449 Baghouse on Catalyst Silo 1449
GRP003	Davison Catalyst	EQT93 50-90 - 6448 Baghouse on Catalyst Silo 1448
GRP003	Davison Catalyst	EQT92 5-96 - 6725 & 6726 Baghouses on Alumina Unloading & Silo 1726
GRP003	Davison Catalyst	EQT91 5-91 - 6655 Ammonia Absorber on XP Flash Dryer Baghouse 6672
GRP003	Davison Catalyst	EQT90 5-90 - 6675D Dust Collector on XP Silo 1675D
GRP003	Davison Catalyst	EQT89 5-87 - 6085A Baghouse on Silo 1085A
GRP003	Davison Catalyst	EQT88 5-01 - 6815 Baghouse on Calciner Feed Hopper 1815
GRP003	Davison Catalyst	EQT87 49-90 - 6447 Baghouse on Catalyst Silo 1447
GRP003	Davison Catalyst	EQT86 48-90 - 6446 Baghouse on Catalyst Silo 1446
GRP003	Davison Catalyst	EQT85 47-90 - 6445 Baghouse on Catalyst Silo 1445
GRP003	Davison Catalyst	EQT84 46-90 - 6444 Baghouse on Catalyst Silo 1444
GRP003	Davison Catalyst	EQT83 45-90 - 6443 Baghouse on Catalyst Silo 1443
GRP003	Davison Catalyst	EQT82 44-90 - 6442 Baghouse on Catalyst Silo 1442
GRP003	Davison Catalyst	EQT81 43-90 - 6441 Baghouse on Catalyst Silo 1441
GRP003	Davison Catalyst	EQT80 42-90 - 6440 Baghouse on Catalyst Silo 1440
GRP003	Davison Catalyst	EQT79 41-90 - 6439 Baghouse on Catalyst Silo 1439
GRP003	Davison Catalyst	EQT78 40-90 - 6438 Baghouse on Catalyst Silo 1438
GRP003	Davison Catalyst	EQT77 4-96 - 6730 Baghouse on Recycle Day Bin 1730

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Subject Item Groups:		Included Components (from Above)
ID	Description	
GRP003	Davison Catalyst	EQT76 4-91 - 6337 Baghouse on Clay Unloading Dust
GRP003	Davison Catalyst	EQT75 4-90 - 6675C Dust Collector on XP Silo 1675C
GRP003	Davison Catalyst	EQT74 4-87 - 6085 Baghouse on Silo 1085
GRP003	Davison Catalyst	EQT73 4-79 - 1114 Gasoline Storage Tank (Submerged Fill Line)
GRP003	Davison Catalyst	EQT72 4-78 - 6282 Baghouse Stack (Z-14 Spray Dryer)
GRP003	Davison Catalyst	EQT71 4-76 - 1380 Filtrate Tank
GRP003	Davison Catalyst	EQT70 4-01 - 6814 Baghouse on Classifier Cyclone 6813
GRP003	Davison Catalyst	EQT69 39-90 - 6437 Baghouse on Catalyst Silo 1090C
GRP003	Davison Catalyst	EQT68 38-90 - 6436 Baghouse on Catalyst Silo 1090B
GRP003	Davison Catalyst	EQT67 37-90 - 6435 Baghouse on Catalyst Silo 1090A
GRP003	Davison Catalyst	EQT66 36-90 - 6434 Baghouse on Catalyst Silo 1090
GRP003	Davison Catalyst	EQT65 3-94 - 8500 CX-400 Steam Boiler (300 PSIG)
GRP003	Davison Catalyst	EQT64 3-91 - 6336A Dust Collector on Clay Silo 1300
GRP003	Davison Catalyst	EQT63 3-90 - 6675B Dust Collector on XP Silo 1675B
GRP003	Davison Catalyst	EQT62 3-87 - 6336 Dust Collector on Clay Silo 1300
GRP003	Davison Catalyst	EQT61 3-79 - 8259 Process Water Heater Vent (@ Z-14)
GRP003	Davison Catalyst	EQT60 3-76 - 8175 Steam Boiler
GRP003	Davison Catalyst	EQT59 3-73 - 8001B Spray Dryer Stack
GRP003	Davison Catalyst	EQT58 3-02 - 6408 HCl Fume Scrubber Emergency Stack
GRP003	Davison Catalyst	EQT57 3-01 - 8811 Spray Dryer / 8820 Calciner Scrubber Stack
GRP003	Davison Catalyst	EQT56 29-90 - 6025 Baghouse on Catalyst Air Slides
GRP003	Davison Catalyst	EQT55 28-90 - 1633 Stack on Scrubbers 6631 & 6644
GRP003	Davison Catalyst	EQT54 27-90 - 6608 Dust Collector on Raw Clay Silo 1608
GRP003	Davison Catalyst	RLP4 11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse
GRP003	Davison Catalyst	EQT13 1-73 - 8101 Spray Dryer Stack
GRP004	Dryers, Coolers and Furnaces	EQT59 3-73 - 8001B Spray Dryer Stack
GRP004	Dryers, Coolers and Furnaces	EQT105 7-73 - 8090 Silicate Furnace Stack 8090A
GRP004	Dryers, Coolers and Furnaces	EQT14 1-76 - 8075A Steam Boiler
GRP005	Steam Boilers	EQT11 2-76 - 8075 Steam Boiler
GRP005	Steam Boilers	EQT60 3-76 - 8175 Steam Boiler
GRP005	Steam Boilers	EQT65 3-94 - 8500 CX-400 Steam Boiler (300 PSIG)
GRP006	Dust Control Equipment	EQT11 1-02 - 6622 Baghouse on XP Blend Silo 1622
GRP006	Dust Control Equipment	EQT15 1-79 - 6280 Dust Collector on Silo 1280
GRP006	Dust Control Equipment	EQT16 1-81 - 6100 Container Loading Dust Collector
GRP006	Dust Control Equipment	EQT17 1-87 - 6280A Dust Collector on Silo 1280A
GRP006	Dust Control Equipment	EQT19 1-90 - 6675 Dust Collector on XP Silo 1675
GRP006	Dust Control Equipment	EQT40 2-02 - 6622A Baghouse on XP Blend Silo 1622A

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**Subject Item Groups:**

ID	Description	Included Components (from Above)
GRP006	Dust Control Equipment	EQT43 2-90 - 6675A Dust Collector on XP Silo 1675A
GRP006	Dust Control Equipment	EQT47 2-96 - 6728 Baghouse on Alumina Weigh Bin 1728
GRP006	Dust Control Equipment	EQT63 3-90 - 6675B Dust Collector on XP Silo 1675B
GRP006	Dust Control Equipment	EQT64 3-91 - 6336A Dust Collector on Clay Silo 1300
GRP006	Dust Control Equipment	EQT66 36-90 - 6434 Baghouse on Catalyst Silo 1090
GRP006	Dust Control Equipment	EQT67 37-90 - 6435 Baghouse on Catalyst Silo 1090A
GRP006	Dust Control Equipment	EQT68 38-90 - 6436 Baghouse on Catalyst Silo 1090B
GRP006	Dust Control Equipment	EQT69 39-90 - 6437 Baghouse on Catalyst Silo 1090C
GRP006	Dust Control Equipment	EQT74 4-87 - 6085 Baghouse on Silo 1085
GRP006	Dust Control Equipment	EQT75 4-90 - 6675C Dust Collector on XP Silo 1675C
GRP006	Dust Control Equipment	EQT76 4-91 - 6337 Baghouse on Clay Unloading Dust
GRP006	Dust Control Equipment	EQT78 40-90 - 6438 Baghouse on Catalyst Silo 1438
GRP006	Dust Control Equipment	EQT79 41-90 - 6439 Baghouse on Catalyst Silo 1439
GRP006	Dust Control Equipment	EQT80 42-90 - 6440 Baghouse on Catalyst Silo 1440
GRP006	Dust Control Equipment	EQT81 43-90 - 6441 Baghouse on Catalyst Silo 1441
GRP006	Dust Control Equipment	EQT82 44-90 - 6442 Baghouse on Catalyst Silo 1442
GRP006	Dust Control Equipment	EQT83 45-90 - 6443 Baghouse on Catalyst Silo 1443
GRP006	Dust Control Equipment	EQT84 46-90 - 6444 Baghouse on Catalyst Silo 1444
GRP006	Dust Control Equipment	EQT85 47-90 - 6445 Baghouse on Catalyst Silo 1445
GRP006	Dust Control Equipment	EQT86 48-90 - 6446 Baghouse on Catalyst Silo 1446
GRP006	Dust Control Equipment	EQT87 49-90 - 6447 Baghouse on Catalyst Silo 1447
GRP006	Dust Control Equipment	EQT89 5-87 - 6085A Baghouse on Silo 1085A
GRP006	Dust Control Equipment	EQT90 5-90 - 6675D Dust Collector on XP Silo 1675D
GRP006	Dust Control Equipment	EQT93 50-90 - 6448 Baghouse on Catalyst Silo 1448
GRP006	Dust Control Equipment	EQT94 51-90 - 6449 Baghouse on Catalyst Silo 1449
GRP006	Dust Control Equipment	EQT95 52-90 - 6450 Baghouse on Catalyst Silo 1450
GRP006	Dust Control Equipment	EQT96 53-90 - 6451 Baghouse on Catalyst Silo 1451
GRP006	Dust Control Equipment	EQT97 54-90 - 6452 Baghouse on Catalyst Silo 1452
GRP006	Dust Control Equipment	EQT98 55-90 - 6453 Baghouse on Catalyst Silo 1453
GRP006	Dust Control Equipment	EQT101 6-83 - 6097 Dust Collector on Reclaim Silo 1097
GRP006	Dust Control Equipment	EQT102 6-87 - 6085B Baghouse on Silo 1085B
GRP006	Dust Control Equipment	EQT103 6-90 - 6675E Dust Collector on XP Silo 1675E
GRP006	Dust Control Equipment	EQT107 7-87 - 6085C Baghouse on Silo 1085C
GRP006	Dust Control Equipment	EQT110 8-87 - 6085D Baghouse on Silo 1085D
GRP006	Dust Control Equipment	EQT116 9-87 - 6085E Baghouse on Silo 1085E
GRP007	Baghouses	EQT20 1-92 - Baghouse 6288 on Z-14 Calciner
GRP007	Baghouses	EQT45 2-93 - 6282A Baghouse Stack (Z-14 Spray Dryer No. 2)

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Subject Item Groups:		Included Components (from Above)
ID	Description	
GRP007	Baghouses	EQT72 4-78 - 6282 Baghouse Stack (Z-14 Spray Dryer)
GRP007	Baghouses	EQT111 8-90 - 6672 Baghouse on Flash Dryer 8671
GRP008	Dust Collectors and Baghouses	EQT10 1-01 - 6808 Baghouse on Dry Clay Hopper 1808
GRP008	Dust Collectors and Baghouses	EQT18 1-89 - 6051 Dust Collector on Soda Ash Loading & Mixing
GRP008	Dust Collectors and Baghouses	EQT23 1-97 - 6029 Dust Collector on Alumina Silo 1029
GRP008	Dust Collectors and Baghouses	EQT24 1-99 - 6086X/Y Dust Collectors on Sand/Soda Ash Blins 1086/A
GRP008	Dust Collectors and Baghouses	EQT31 12-81 - 6013 Dust Collector Silo 1300
GRP008	Dust Collectors and Baghouses	EQT34 13-81 - 6014 Dust Collector on Clay Day Silo 1320
GRP008	Dust Collectors and Baghouses	EQT37 14-90 - 6601 Dust Collector on NKC Silo 1601
GRP008	Dust Collectors and Baghouses	EQT39 2-01 - 6807 Baghouse on Dry Rare Earth Carbonate Hopper 1807
GRP008	Dust Collectors and Baghouses	EQT49 22-90 - 6638 Dust Collector on Calciner Silo 1638
GRP008	Dust Collectors and Baghouses	EQT50 23-90 - 6607 Raw Clay Unloading Transfer Receiver
GRP008	Dust Collectors and Baghouses	EQT51 24-90 - 6606 Dust Collector on Raw Clay Silo 1606
GRP008	Dust Collectors and Baghouses	EQT52 25-90 - 6602A NKC Unloading Transfer Receiver
GRP008	Dust Collectors and Baghouses	EQT53 26-90 - 6070A Dust Collector on Z-14 Tank 1070
GRP008	Dust Collectors and Baghouses	EQT54 27-90 - 6608 Dust Collector on Raw Clay Silo 1608
GRP008	Dust Collectors and Baghouses	EQT56 29-90 - 6025 Baghouse on Catalyst Air Slides
GRP008	Dust Collectors and Baghouses	EQT62 3-87 - 6336 Dust Collector on Clay Silo 1300
GRP008	Dust Collectors and Baghouses	EQT70 4-01 - 6814 Baghouse on Classifier Cyclone 6813
GRP008	Dust Collectors and Baghouses	EQT88 5-01 - 6815 Baghouse on Calciner Feed Hopper 1815
GRP008	Dust Collectors and Baghouses	EQT92 5-96 - 6725 & 6726 Baghouses on Alumina Unloading & Silo 1726
GRP008	Dust Collectors and Baghouses	EQT99 56-90 - 6460 Baghouse on Catalyst Loading
GRP008	Dust Collectors and Baghouses	EQT100 6-01 - 6842 Baghouse on DA Rare Earth Carbonate Silo 1842
GRP008	Dust Collectors and Baghouses	EQT106 7-83 - 6157 Dust Collector on CP-3/CX-200 Tank 1157
GRP008	Dust Collectors and Baghouses	EQT108 7-90 - 6636 Baghouse on Classifier Cyclone 6635
GRP008	Dust Collectors and Baghouses	EQT109 7-93 - 6087 Z-14 Unloading Transfer Receiver
GRP008	Dust Collectors and Baghouses	EQT114 9-01 - 6607A Baghouse on Dry Clay Transfer
GRP009	Emergency vents and Stacks	EQT25 10-01 - 8820 Calciner Emergency Stack for DA Unit
GRP009	Emergency vents and Stacks	EQT27 11-01 - 8640 XP Calciner Emergency Stack
GRP009	Emergency vents and Stacks	EQT33 12-96 - 8747 Base Calciner Emergency Stack
GRP009	Emergency vents and Stacks	EQT121 1-06 - 8283 Z-14 Calciner No.1 Emergency Vent
GRP009	Emergency vents and Stacks	EQT122 2-06 - 8283A Z-14 Calciner No.2 Emergency Vent
GRP009	Emergency vents and Stacks	EQT117 3-06 - 2071 Super D Cooling Tower
GRP010	Cooling Towers	EQT118 4-06 - 2055 Silicate Cooling Tower
GRP010	Cooling Towers	EQT119 5-06 - 2183 Air Compressor Cooling Tower
GRP010	Cooling Towers	EQT120 6-06 - 2774 HPC Cooling Tower
GRP011	Boilers	EQT22 1-96 - 8092 300 PSIG Steam Boiler

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**Subject Item Groups:**

ID	Description	Included Components (from Above)
GRP011	Boilers	EQT32 12-90 - 8076 Steam Boiler (150 PSIG)
GRP012	Scrubber and Absorbers	EQT44 2-91 - 6233 Z-14 Ammonia Absorber
GRP012	Scrubber and Absorbers	EQT91 5-91 - 6655 Ammonia Absorber on XP Flash Dryer Baghouse 6672
GRP013	Scrubbers	EQT28 11-87 - 6010 HCl Scrubber For Tank 1144
GRP013	Scrubbers	EQT29 11-90 - 6048 Scrubber on HCl Storage Tank 1048
GRP013	Scrubbers	EQT36 13-96 - 6776 Nitric Acid Storage Tank Vent Scrubber
GRP013	Scrubbers	EQT104 6-93 - 6021 Aqua Ammonia Tanks Vent Scrubber
GRP013	Scrubbers	EQT115 9-83 - 6408 HCl Fume Scrubber Stack
GRP014	Fugitives	FUG1 F-23 - Fugitives (DA area)
GRP014	Fugitives	FUG2 F11 - Fugitives (Super D Area)
GRP014	Fugitives	FUG3 F12 - Fugitives (HPC Area)
GRP014	Fugitives	FUG5 F2 - Fugitives (Z-14 Area)
GRP014	Fugitives	FUG6 F21 - Fugitives (Product Silos Area)
GRP014	Fugitives	FUG7 F22 - Fugitives (Ammonia Unloading Area)

**Relationships:**

Subject Item	Relationship	Subject Item
EQT45 2-93 - 6282A Baghouse Stack (Z-14 Spray Dryer No. 2)	Controlled by	EQT21 1-93 - 6233A Z-14 Ammonia Absorber No. 2
EQT58 3-02 - 6408 HCl Fume Scrubber Emergency Stack	Controlled by	EQT115 9-83 - 6408 HCl Fume Scrubber Stack
EQT72 4-78 - 6282 Baghouse Stack (Z-14 Spray Dryer)	Controlled by	EQT44 2-91 - 6233 Z-14 Ammonia Absorber
EQT111 8-90 - 6672 Baghouse on Flash Dryer 8671	Controlled by	EQT91 5-91 - 6655 Ammonia Absorber on XP Flash Dryer Baghouse 6672
EQT121 1-06 - 8283 Z-14 Calciner No.1 Emergency Vent	Controlled by	EQT44 2-91 - 6233 Z-14 Ammonia Absorber
EQT122 2-06 - 8283A Z-14 Calciner No.2 Emergency Vent	Controlled by	EQT21 1-93 - 6233A Z-14 Ammonia Absorber No. 2
EQT123 Milled Recycled Surge Bin 1771	Controlled by	EQT26 10-96 - 6771 Baghouse on Milled Recycled Surge Bin 1771
EQT124 6769 SCR	Vents to	RLP4 11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse
EQT125 6764 Fugitive Dust Baghouse	Vents to	RLP4 11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse
EQT126 Base Dryer	Controlled by	EQT124 6769 SCR
EQT127 Product Dryer	Controlled by	EQT124 6769 SCR
EQT128 Calciner	Controlled by	EQT124 6769 SCR
EQT129 8769 SCR Heater and Process Emissions	Controlled by	EQT124 6769 SCR
EQT130 8001B Spray Dryer (Super D Catalyst Unit)	Vents to	EQT59 3-73 - 8001B Spray Dryer Stack
EQT131 8005 Spray Dryer (Super D Catalyst Unit)	Vents to	EQT42 2-78 - 8005 Spray Dryer Stack
EQT132 8101 Spray Dryer (Super D Catalyst Unit)	Vents to	EQT13 1-73 - 8101 Spray Dryer Stack
EQT133 8282 Spray Dryer (Z-14 Additives Unit No.1)	Controlled by	EQT44 2-91 - 6233 Z-14 Ammonia Absorber
EQT134 8283 Calciner (Z-14 Additives Unit No.1)	Controlled by	EQT44 2-91 - 6233 Z-14 Ammonia Absorber
EQT135 8282A Spray Dryer (Z-14 Additives Unit No.2)	Controlled by	EQT21 1-93 - 6233A Z-14 Ammonia Absorber No. 2
EQT136 8283A Calciner (Z-14 Additives Unit No.2)	Controlled by	EQT21 1-93 - 6233A Z-14 Ammonia Absorber No. 2

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**Relationships:**

Subject Item	Relationship	Subject Item
EQT137 8629 Spray Dryer (XP Catalyst Unit)	Controlled by	EQT55 28-90 - 1633 Stack on Scrubbers 6631 & 6644
EQT138 8640 Calciner (XP Catalyst Unit)	Controlled by	EQT55 28-90 - 1633 Stack on Scrubbers 6631 & 6644
EQT139 8747 Calciner (HPC Unit)	Vents to	RLP4 11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse
EQT140 8811 Spray Dryer (DA Catalyst Unit)	Vents to	EQT57 3-01 - 8811 Spray Dryer / 8820 Calciner Scrubber Stack
EQT141 8820 Calciner (DA Catalyst Unit)	Vents to	EQT57 3-01 - 8811 Spray Dryer / 8820 Calciner Scrubber Stack

**Stack Information:**

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
EQT010	45.9	1500	.83		92	100
EQT011	84.9	1000	.5		80	100
EQT012	4.6	54	.5		23	150
EQT013	29.5	73000	7.25		130	170
EQT014	14.5	3700	2.33		35	584
EQT015	59	1000	.6		80	95
EQT016	52	1200	.7		28	86
EQT017	59	1000	.6		80	85
EQT018	67.7	1000	.56		35	85
EQT019	19.8	2099	1.5		100	200
EQT020	22.8	3000	1.67		87	122
EQT021	91	38568	3		87	165
EQT022	46.1	26620	3.5		100	309
EQT023	37.1	1000	.75		71	95
EQT024	42.2	2000	.79		75	95
EQT025	10.6	4500	3		146	1500
EQT026	278.8	5843	.67		105	246
EQT027	21.2	4000	2		117	1500
EQT028	22.1	1500	1.2		45	100
EQT029	2.1	10.8	.33		20	100
EQT031	98.2	1400	.55		98	79
EQT032	35	6600	2		53	276
EQT033	26	11000	3		132	1000
EQT034	57	1400	.72		80	79
EQT036	35.8	47	.17		32	100
EQT037	25.9	1221	1		108	83
EQT038	7.41	3142	3		50	110
EQT039	30.6	1000	.83		91	100
EQT040	84.9	1000	.5		80	100
EQT041	14.5	3700	2.33		35	584
EQT042	33	126000	9		102	295
EQT043	19.8	2099	1.5		100	200
EQT044	82.9	35141	3		87	165

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**Stack Information:**

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
EQT045	81.2	34425	3		80	300
EQT046	66.1	14000	3		65	130
EQT047	86.3	254	.25		151	100
EQT048	13.1	1089	1.33		23	116
EQT049	86.3	1967	.7		75	200
EQT050	25.8	1214	1		20	80
EQT051	25.8	1215	1		99	81
EQT052	25.8	1214	1		35	80
EQT053	31.3	1304	.94		34	80
EQT054	98.4	2273	.7		70	104
EQT055	35.6	154000	9.58		130	161
EQT056	40.1	1300	.83		49	148
EQT057	52.9	50500	4.5		199	163
EQT058	8.5	400	1		16	85
EQT059	29.5	73000	7.25		130	170
EQT060	14.5	3700	2.33		25	584
EQT061	5.37	3100	3.5		17.7	171
EQT062	93.4	1100	.5		98	117
EQT063	19.8	2099	1.5		100	200
EQT064	42.2	497	.5		106	85
EQT065	20.4	1700	1.33		100	575
EQT066	35.3	2391	1.2		103	240
EQT067	35.3	2391	1.2		103	240
EQT068	35.3	2391	1.2		103	240
EQT069	35.3	2391	1.2		103	240
EQT070	79.6	15000	2		141	100
EQT071			.83		30	85
EQT072	66	28000	3		87	350
EQT073			.17		15	85
EQT074	65	1500	.7		47	148
EQT075	19.8	2099	1.5		100	200
EQT076	63.7	12000	2		28	70
EQT077	86.3	254	.25		151	100
EQT078	35.3	2391	1.2		101	240
EQT079	35.3	2391	1.2		101	240
EQT080	35.3	2391	1.2		101	240
EQT081	35.3	2391	1.2		101	240
EQT082	35.3	2391	1.2		101	240
EQT083	35.3	2391	1.2		101	240
EQT084	35.3	2391	1.2		101	240
EQT085	35.3	2391	1.2		101	240
EQT086	36.9	2500	1.2		101	170

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**Stack Information:**

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
EQT087	36.9	2500	1.2		101	170
EQT088	12	1000	1.33		125	150
EQT089	65	1500	.7		47	148
EQT090	19.8	2099	1.5		100	200
EQT091	66.3	34000	3.3		105	135
EQT092	79	2583	.83		130	100
EQT093	36.9	2500	1.2		101	170
EQT094	36.9	2500	1.2		101	170
EQT095	36.9	2500	1.2		101	170
EQT096	36.9	2500	1.2		101	170
EQT097	36.9	2500	1.2		101	170
EQT098	36.9	2500	1.2		101	170
EQT099	86.7	2000	.7		44	70
EQT100	45.9	1500	.83		46	100
EQT101	59	1000	.6		100	85
EQT102	65	1500	.7		47	148
EQT103	19.8	2099	1.5		100	200
EQT104	9	12.7	.17		30	80
EQT105	39.1	46000	5		199	550
EQT106	60.6	1400	.7		31	128
EQT107	65	1500	.7		47	148
EQT108	47.8	9002	2		80	108
EQT109	13.6	642	1		8	80
EQT110	65	1500	.7		47	148
EQT111	66	28000	3		51	294
EQT112	56.9	84116	5.6		100	156
EQT113	101.3	133	.17		151	125
EQT114	101.9	1200	.5		47	100
EQT115	8.5	400	1		16	85
EQT116	65	1500	.7		47	148
EQT117	6	10174	6		15	85
EQT118	6	10174	6		15	85
EQT119	8.2	13847	6		15	85
EQT120	2.7	4522	6		15	85
EQT121	12.8	15050	5		50	1500
EQT122	23.4	27500	5		75	1500
EQT124						
FUG001					69	78
FUG002					60	78
FUG003					30	78
FUG004					5	78
FUG005					40	78

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**Air - Title V Regular Permit Renewal**

**Stack Information:**

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
FUG006					100	78
FUG007					20	78
RLP004	98.7	74395	4		200	503

**Fee Information:**

Subj Item Id	Multiplier	Units Of Measure	Fee Desc
GRP003	1	Lines	0480 - Catalysts Mfg. and Cat. Regeneration

# EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**All phases**

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 010 1-01	0.12	0.12	0.52												
EQT 011	0.08	0.08	0.3												
EQT 013 1-02	18.2	24.0	79.4				27.8	29.2	121.0	1.66	2.08	7.29			
EQT 014 1-73	0.05	0.07	0.22	0.02	0.02	0.09	1.0	1.0	4.0	5.4	8.1	24.0			
EQT 015 1-76	0.17	0.3	0.08												
EQT 016 1-79	0.17	0.3	0.02												
EQT 017 1-81	0.17	0.17	0.01												
EQT 018 1-87	0.3	0.3	1.31												
EQT 019 1-88	0.062	0.062	0.05												
EQT 020 1-90	0.22	0.22	0.01												
EQT 021 1-92	2.89	2.89	12.62	0.01	0.01	0.04	3.0	3.0	13.1	4.75	4.75	20.75			
EQT 022 1-93	1.0	1.0	4.37	0.06	0.06	0.26	8.0	8.0	34.9	10.0	10.0	43.7	1.0	1.0	4.37
EQT 023 1-96	0.3	0.3	0.11												
EQT 024 1-97	0.75	0.75	3.28												
EQT 025 1-99	0.24	0.24	0.03				2.57	2.57	0.33	2.69	2.69	0.35	0.18	0.18	0.02
EQT 026 10-01	0.36	0.36	1.57				0.24	0.24	1.05	0.25	0.25	1.09			
EQT 027 10-96	0.2	0.2	0.01				2.1	2.1	0.11	2.2	2.2	0.11	0.14	0.14	0.01
EQT 031 11-01	0.09	0.15	0.11												
EQT 031 12-81															

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility  
 Activity Number: PER20060005  
 Permit Number: 0520-00001-V9  
 Air - Title V Regular Permit Renewal

**All phases**

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 032 12-90	0.07	0.07	0.27	0.01	0.01	0.05	1.92	1.92	7.1	0.83	0.83	3.1	0.07	0.07	0.2
EQT 033 12-96	104	104	0.21				146.3	146.3	0.29						
EQT 034 13-81	0.09	0.15	0.12												
EQT 037 14-90	0.09	0.09	0.2												
EQT 039 2-01	0.08	0.08	0.35												
EQT 040 2-02	0.08	0.08	0.3												
EQT 041 2-76	0.05	0.07	0.22	0.02	0.02	0.09	1.0	1.0	4.0	5.4	8.1	24.0			
EQT 042 2-78	32.0	32.0	139.8				18.1	22.2	79.0	4.0	5.0	17.5			
EQT 043 2-90	0.062	0.062	0.05												
EQT 044 2-91	2.6	2.6	11.4	0.05	0.05	0.22	3.9	3.9	16.8	2.9	3.2	12.6			
EQT 045 2-93	2.58	2.58	0.07				3.0	3.0	0.08	4.75	4.75	0.12			
EQT 046 2-94	1.57	1.57	6.86												
EQT 047 2-96	0.02	0.02	0.09												
EQT 048 2-97	0.02	0.02	0.02												
EQT 049 22-90	0.06	0.06	0.26												
EQT 050 23-90	0.09	0.09	0.2												
EQT 051 24-90	0.04	0.04	0.18												
EQT 052 25-90	0.09	0.09	0.23												

## EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**All phases**

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 053 26-90	0.09	0.09	0.2												
EQT 054 27-90	0.06	0.06	0.26												
EQT 055 28-90	6.42	6.42	28.04	0.043	0.043	0.19	5.02	5.02	21.93	5.02	5.02	21.93	0.39	0.39	1.7
EQT 056 29-90	0.21	0.3	0.92												
EQT 057 3-01	8.82	8.82	38.53				5.23	5.23	22.84	15.07	15.07	65.83	0.36	0.36	1.57
EQT 059 3-73	18.2	24.0	79.4				27.8	29.2	121.0	1.66	2.08	7.29			
EQT 060 3-76	0.02	0.03	0.1	0.01	0.01	0.04	1.0	1.0	4.0	5.4	8.1	24.0			
EQT 061 3-79	0.10	0.10	0.44				1.8	1.8	7.86	2.47	2.47	10.79			
EQT 062 3-87	0.09	0.15	0.11												
EQT 063 3-90	0.062	0.062	0.05												
EQT 064 3-91	0.04	0.15	0.05												
EQT 065 3-94	0.02	0.02	0.09	0.002	0.002	0.01	0.32	0.32	1.4	0.39	0.39	1.7	0.01	0.01	0.05
EQT 066 36-90	0.13	0.13	0.05												
EQT 067 37-90	0.13	0.13	0.05												
EQT 068 38-90	0.13	0.13	0.05												
EQT 069 39-90	0.13	0.13	0.05												
EQT 070 4-01	0.61	0.61	2.65												
EQT 072 4-18	2.1	2.1	0.11				3.9	3.9	0.2	2.9	3.2	0.15			

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**All phases**

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 073 4-79															
EQT 074 4-87	0.18	0.18	0.04										0.14	0.14	0.61
EQT 075 4-90	0.062	0.062	0.05												
EQT 076 4-91	0.03	0.03	0.04												
EQT 077 4-96	0.02	0.02	0.09												
EQT 078 40-90	0.13	0.13	0.05												
EQT 079 41-90	0.13	0.13	0.05												
EQT 080 42-90	0.13	0.13	0.05												
EQT 081 43-90	0.13	0.13	0.05												
EQT 082 44-90	0.13	0.13	0.05												
EQT 083 45-90	0.13	0.13	0.05												
EQT 084 46-90	0.13	0.13	0.05												
EQT 085 47-90	0.13	0.13	0.05												
EQT 086 48-90	0.15	0.15	0.08												
EQT 087 49-90	0.15	0.15	0.08												
EQT 088 5-01	0.071	0.071	0.31												
EQT 089 5-87	0.18	0.18	0.04												
EQT 090 5-90	0.062	0.062	0.05												

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility  
 Activity Number: PER20060005  
 Permit Number: 0520-00001-V9  
 Air - Title V Regular Permit Renewal

**All phases**

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 091 5-91	3.0	3.0	11.2	0.01	0.01	0.01	0.04	1.92	1.92	7.2	1.33	1.33	0.09	0.09	4.98
EQT 092 5-96	0.2	0.2	0.87												
EQT 093 50-90	0.15	0.15	0.08												
EQT 094 51-90	0.15	0.15	0.08												
EQT 095 52-90	0.15	0.15	0.08												
EQT 096 53-90	0.15	0.15	0.08												
EQT 097 54-90	0.15	0.15	0.08												
EQT 098 55-90	0.15	0.15	0.08												
EQT 099 56-90	0.15	0.15	0.44												
EQT 100 6-01	0.06	0.06	0.26												
EQT 101 6-83	0.17	0.3	0.05												
EQT 102 6-87	0.18	0.18	0.04												
EQT 103 6-90	0.062	0.062	0.05												
EQT 105 7-73	6.89	6.89	30.1					40.74	40.74	177.9	1.39	1.39			6.1
EQT 106 7-83	0.17	0.3	0.16												
EQT 107 7-87	0.18	0.18	0.04												
EQT 108 7-90	0.31	0.31	1.35												
EQT 109 7-93	0.05	0.05	0.16												

# EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

## All phases

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 110 8-87	0.18	0.18	0.04												
EQT 111 8-90	3.0	3.0	0.16	0.01	0.01	0.001	1.92	1.92	0.1	1.2	1.2	0.06			
EQT 112 8-93	13.0	13.0	56.8	0.04	0.04	0.17	15.0	15.0	65.52	3.2	3.2	13.98			
EQT 113 8-96	0.01	0.01	0.04												
EQT 114 9-01	0.1	0.1	0.44												
EQT 116 9-87	0.18	0.18	0.04												
EQT 117 3-06	0.24	0.48	1.05												
EQT 118 4-06	0.08	0.12	0.35												
EQT 119 5-06	0.07	0.14	0.31												
EQT 120 6-06	0.02	0.04	0.09												
EQT 121 1-06	0.04	0.04	0.003				2.18	2.18	0.17	1.83	1.83	0.14			
EQT 122 2-06	0.08	0.08	0.006				1.99	1.99	0.16	3.34	3.34	0.26			
RLP 004 11-96	2.58	2.58	11.27				20.0	25.0	87.37	4.08	4.08	17.82	0.27	0.27	1.18

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

### Permit Phase Totals:

PM10: 532.98 tons/yr

SO2: 1.20 tons/yr

NOx: 799.41 tons/yr

CO: 329.64 tons/yr

VOC: 10.05 tons/yr

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**All phases**

Emission rates Notes:

# EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

## All phases

Subject Item	Ammonia			Chlorine			Cobalt compounds			Hydrazine			Hydrochloric acid		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 012 1-03	0.001	0.001	0.004												
EQT 020 1-92	252	252	13.1												
EQT 021 1-93	1.04	1.04	4.54												
EQT 026 10-96							0.009	0.009	0.04						
EQT 028 11-87	0.46	0.46	2.0									0.03	0.04	0.13	0.13
EQT 029 11-90												0.1	0.1	0.44	0.44
EQT 033 12-96							2.62	2.62	0.005						
EQT 036 13-96															
EQT 038 19-90															
EQT 042 2-78	1.14	1.14	5.0												
EQT 044 2-91	4.86	4.86	21.23	0.33	0.33	1.44						0.34	0.34	1.49	1.49
EQT 045 2-93	260	260	6.76												
EQT 055 29-90	2.65	2.65	11.58												
EQT 057 3-01	4.18	4.18	18.26												
EQT 058 3-02												0.004	0.004	< 0.001	< 0.001
EQT 071 4-76	0.001	0.001	0.004												
EQT 072 4-78	252.0	252.0	13.1												
EQT 074 4-87															

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**All phases**

Subject Item	Nickel (and compounds)			Nitric acid			Zinc (and compounds)		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 012 1-03									
EQT 020 1-92									
EQT 021 1-93									
EQT 026 10-96	0.014	0.014	0.06						
EQT 028 11-97									
EQT 029 11-90									
EQT 033 12-96	4.18	4.18	0.008						
EQT 036 13-96				0.28	0.28	0.007			
EQT 038 19-90									
EQT 042 2-78									
EQT 044 2-91									
EQT 045 2-93									
EQT 055 26-90									
EQT 057 3-01									
EQT 058 3-02									
EQT 071 4-76									
EQT 072 4-78									
EQT 074 4-87							0.02	0.02	0.01

# EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

## All phases

Subject Item	Ammonia			Chlorine			Cobalt compounds			Hydrazine			Hydrochloric acid		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 077 4-96							0.001		0.001						
EQT 089 5-87															
EQT 091 5-91	0.61	0.61	2.28									4.15	4.15	15.54	
EQT 099 56-90															
EQT 102 6-87															
EQT 104 6-93	0.06	3.0	0.09												
EQT 107 7-87															
EQT 110 8-87															
EQT 111 8-90	30.5	30.5	1.6									8.3	8.3	0.43	
EQT 112 8-93	3.0	3.0	13.1												
EQT 113 8-96							< 0.001	< 0.001	0.001						
EQT 115 9-83												0.004	2.4	0.02	
EQT 116 9-87															
FUG 001 F-23	2.17	2.17	9.5												
FUG 002 F11	3.96	3.96	17.4												
FUG 003 F12	0.11	0.11	0.5												
FUG 004 F13										0.002	0.002	0.009			
FUG 005 F2	1.32	1.32	5.8												

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

**All phases**

Subject Item	Nickel (and compounds)			Nitric acid			Zinc (and compounds)		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
EQT 077 4-96	0.001	0.001	0.004						
EQT 089 5-87							0.02	0.02	0.01
EQT 091 5-91									
EQT 099 56-90							0.01	0.01	0.03
EQT 102 6-87							0.02	0.02	0.01
EQT 104 6-93									
EQT 107 7-87							0.02	0.02	0.01
EQT 110 8-87							0.02	0.02	0.01
EQT 111 8-90									
EQT 112 8-93									
EQT 113 8-96	< 0.001	< 0.001	0.002						
EQT 115 9-83									
EQT 116 9-87							0.02	0.02	0.01
FUG 001 F-23									
FUG 002 F11									
FUG 003 F12									
FUG 004 F13									
FUG 005 F2									

# EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

## All phases

Subject Item	Ammonia			Chlorine			Cobalt compounds			Hydrazine			Hydrochloric acid		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
FUG 006 F21	1.32	1.32	5.8												
FUG 007 F22	2.69	2.69	11.75												
RLP 004 11-96	14.0	14.0	61.15				0.065	0.065	0.28						

# EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility  
 Activity Number: PER20060005  
 Permit Number: 0520-00001-V9  
 Air - Title V Regular Permit Renewal

## All phases

Subject Item	Nickel (and compounds)			Nitric acid			Zinc (and compounds)		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
FUG 006 F21									
FUG 007 F22									
RLP 004 11-98	0.103	0.103	0.45						

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

### Permit Parameter Totals:

- Ammonia: 224.55 tons/yr
- Chlorine: 1.44 tons/yr
- Cobalt compounds: 0.33 tons/yr
- Hydrazine: 0.01 tons/yr
- Hydrochloric acid: 83.40 tons/yr
- Nickel (and compounds): 0.52 tons/yr
- Nitric acid: 0.01 tons/yr
- Zinc (and compounds): 0.09 tons/yr

### Emission Rates Notes:

## SPECIFIC REQUIREMENTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

### EQT013 1-73 - 8101 Spray Dryer Stack

- 1 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 2 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 3 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]

### EQT021 1-93 - 6233A Z-14 Ammonia Absorber No. 2

- 4 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 5 Sulfur dioxide  $\leq$  2000 ppmv at standard conditions. [LAC 33:III.1503.C]
- Which Months: All Year Statistical Basis: Three-hour average
- 6 Permittee shall monitor and record opacity weekly using Method 9. Permittee shall also conduct daily visual inspection on all baghouses and bin vents for plume detection. If a noticeable plume is detected, within three (3) days, a certified Method 9 reader shall be called upon to determine opacity. Corrective action must be taken if opacity exceeds 10%. Permittee shall have a Preventive Maintenance Program to ensure integrity of the baghouses. Records of all weekly Method 9 opacity readings and documents showing any opacity readings on all baghouses and bin vents where corrective action was required shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, LDEQ. [LAC 33:III.501.C.6]

### EQT026 10-96 - 6771 Baghouse on Milled Recycled Surge Bin 1771

- 7 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 8 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 9 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 10 Baghouses: Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 11 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

**AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility**

**Activity Number: PER20060005**

**Permit Number: 0520-00001-V9**

**Air - Title V Regular Permit Renewal**

**EQT026      10-96 - 6771 Baghouse on Milled Recycled Surge Bin 1771**

- 12 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 13 The baghouse shall be maintained and operated properly and all the emission vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months or whenever visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, Louisiana DEQ. [LAC 33:III.501.C.6]
- 14 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Operate the baghouse with control efficiency of 99.9% for nickle impregnated particles determined as MACT. The baghouses shall be maintained and operated properly. The filter elements (bags) shall be inspected every six months or whenever the visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. [LAC 33:III.5109.A]
- 15 Submit CAM plan to LDEQ and EPA. Comply with the all applicable requirements of 40 CFR Part 64. [40 CFR 64]

**EQT032      12-90 - 8076 Steam Boiler (150 PSIG)**

- 16 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]  
Which Months: All Year    Statistical Basis: None specified
- 17 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year    Statistical Basis: Six-minute average
- 18 Sulfur dioxide <= 2000 ppmv at standard conditions. [LAC 33:III.1503.C]  
Which Months: All Year    Statistical Basis: Three-hour average
- 19 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 20 Submit notification: Due as specified in 40 CFR 60.7. Submit the date of construction or reconstruction, anticipated startup, and actual startup. Include the information specified in 40 CFR 60.48c(a)(1) through (a)(4) as applicable. Subpart Dc. [40 CFR 60.48c(a)]
- 21 The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month. [40 CFR 60.48c(g)]
- 22 Maintain all records required under 40 CFR 60.48c for a period of 2 years following the date of such record. Subpart Dc. [40 CFR 60.48c(i)]

**EQT038      19-90 - 1614-B CX-100 Reactor's Vent**

- 23 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

**EQT042      2-78 - 8005 Spray Dryer Stack**

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### EQ1042    2-78 - 8005 Spray Dryer Stack

- 24 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year    Statistical Basis: Six-minute average
- 25 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 26 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. Use alternate stack test methods only with the prior approval of the Office of such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 27 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]
- Which Months: All Year    Statistical Basis: None specified
- 28 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 29 Baghouses: Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. [LAC 33:III.501.C.6]
- Change elements as necessary. [LAC 33:III.501.C.6]
- Which Months: All Year    Statistical Basis: None specified
- 30 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]
- Which Months: All Year    Statistical Basis: None specified
- 31 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 32 Permittee shall monitor and record opacity weekly using Method 9. Permittee shall also conduct daily visual inspection on all baghouses and bin vents for plume detection. If a noticeable plume is detected, within three (3) days, a certified Method 9 reader shall be called upon to determine opacity. Corrective action must be taken if opacity exceeds 10%. Permittee shall have a Preventive Maintenance Program to ensure integrity of the baghouses. Records of all weekly Method 9 opacity readings and documents showing any opacity readings on all baghouses and bin vents where corrective action was required shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, LDEQ. [LAC 33:III.501.C.6]
- 33 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

### EQ1046    2-94 - 6501 CX Alumina Spray Cooler

- 34 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year    Statistical Basis: Six-minute average

### EQ1048    2-97 - 6318W Scrubber on Oxalic Acid Mix Tank 1318

**SPECIFIC REQUIREMENTS**

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**EQT048**    **2-97 - 6318W Scrubber on Oxalic Acid Mix Tank 1318**

35 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year    Statistical Basis: Six-minute average

**EQT055**    **28-90 - 1633 Stack on Scrubbers 6631 & 6644**

36 Sulfur dioxide <= 2000 ppmv at standard conditions. [LAC 33:III.1503.C]

Which Months: All Year    Statistical Basis: Three-hour average

37 Flow rate monitored by flow rate monitoring device once every four hours. [LAC 33:III.501.C.6]

Which Months: All Year    Statistical Basis: None specified

38 Flow rate recordkeeping by electronic or hard copy once every four hours. [LAC 33:III.501.C.6]

39 Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]

40 For spray dryer scrubber, Flow rate >= 2000 gallons/min. [LAC 33:III.501.C.6]

Which Months: All Year    Statistical Basis: None specified

41 For calciner scrubber, Flow rate >= 60 gallons/min. [LAC 33:III.501.C.6]

Which Months: All Year    Statistical Basis: None specified

42 Permittee shall monitor and record opacity weekly using Method 9. Permittee shall also conduct daily visual inspection on all baghouses and bin vents for plume detection. If a noticeable plume is detected, within three (3) days, a certified Method 9 reader shall be called upon to determine opacity. Corrective action must be taken if opacity exceeds 10%. Permittee shall have a Preventive Maintenance Program to ensure integrity of the baghouses. Records of all weekly Method 9 opacity readings and documents showing any opacity readings on all baghouses and bin vents where corrective action was required shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, LDEQ. [LAC 33:III.501.C.6]

43 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

44 Submit CAM plan to LDEQ and EPA. Comply with the all applicable requirements of 40 CFR Part 64. [40 CFR 64]

**EQT057**    **3-01 - 8811 Spray Dryer / 8820 Calciner Scrubber Stack**

45 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year    Statistical Basis: Six-minute average

46 Flow rate monitored by flow rate monitoring device once every four hours. [LAC 33:III.501.C.6]

Which Months: All Year    Statistical Basis: None specified

47 Flow rate recordkeeping by electronic or hard copy once every four hours. [LAC 33:III.501.C.6]

48 Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]

49 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]

50 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]

Which Months: All Year    Statistical Basis: None specified

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### EQT057 3-01 - 8811 Spray Dryer / 8820 Calciner Scrubber Stack

- 51 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 52 Baghouses: Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 53 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 54 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 55 For venture scrubber, Flow rate  $\geq$  300 gallons/min. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 56 For packed bed scrubber, Flow rate  $\geq$  400 gallons/min. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 57 Permittee shall monitor and record opacity weekly using Method 9. Permittee shall also conduct daily visual inspection on all baghouses and bin vents for plume detection. If a noticeable plume is detected, within three (3) days, a certified Method 9 reader shall be called upon to determine opacity. Corrective action must be taken if opacity exceeds 10%. Permittee shall have a Preventive Maintenance Program to ensure integrity of the baghouses. Records of all weekly Method 9 opacity readings and documents showing any opacity readings on all baghouses and bin vents where corrective action was required shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, LDEQ. [LAC 33:III.501.C.6]
- 58 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. The permittee shall conduct performance test for particulate matter, NOx, CO, HCl, and NH3 emissions at the maximum operating rate. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 5 - Determination of Particulate Matter Emissions from Stationary Sources; and approved test methods and procedures for hydrogen chloride and ammonia. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 59 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]
- 60 Submit CAM plan to LDEQ and EPA. Comply with the all applicable requirements of 40 CFR Part 64. [40 CFR 64]

### EQT058 3-02 - 6408 HCl Fume Scrubber Emergency Stack

- 61 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

### EQT061 3-79 - 8259 Process Water Heater Vent (@ Z-14)

- 62 Opacity  $\leq$  20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: None specified

**SPECIFIC REQUIREMENTS**

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**EQT061     3-79 - 8259 Process Water Heater Vent (@ Z-14)**

63 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year     Statistical Basis: Six-minute average

**EQT071     4-76 - 1380 Filtrate Tank**

64 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

**EQT073     4-79 - 1114 Gasoline Storage Tank (Submerged Fill Line)**

65 Equip with a submerged fill pipe. [LAC 33:III.2103.A]

66 Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e. [LAC 33:III.2103.H.3]

67 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable. [LAC 33:III.2103.I]

**EQT077     4-96 - 6730 Baghouse on Recycle Day Bin 1730**

68 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year     Statistical Basis: Six-minute average

69 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

70 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]  
Which Months: All Year     Statistical Basis: None specified

71 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

72 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]  
Which Months: All Year     Statistical Basis: None specified

73 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

74 The baghouse shall be maintained and operated properly and all the emission vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months or whenever visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, Louisiana DEQ. [LAC 33:III.501.C.6]

75 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Operate the baghouse with control efficiency of 99.9% for nickel impregnated particles determined as MACT. The baghouses shall be maintained and operated properly. The filter elements (bags) shall be inspected every six months or whenever the visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. [LAC 33:III.5109.A]

**EQT105     7-73 - 8090 Silicate Furnace Stack 8090A**

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### EQT105    7-73 - 8090 Silicate Furnace Stack 8090A

- 76 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 77 Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. [LAC 33:III.501.C.6]
- 78 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]

### EQT112    8-93 - 6074 Catalyst Flash Dryers Ammonia Absorber

- 79 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year    Statistical Basis: Six-minute average
- 80 Sulfur dioxide  $\leq$  2000 ppmv at standard conditions. [LAC 33:III.1503.C]
- Which Months: All Year    Statistical Basis: Three-hour average
- 81 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 82 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.5109]
- 83 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

### EQT113    8-96 - 6751 Baghouse on Impregnator Surge Bin 1751

- 84 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year    Statistical Basis: Six-minute average
- 85 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]
- Which Months: All Year    Statistical Basis: None specified
- 86 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 87 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]
- Which Months: All Year    Statistical Basis: None specified

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### EQT113 8-96 - 6751 Baghouse on Impregnator Surge Bin 1751

- 88 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 89 The baghouse shall be maintained and operated properly and all the emission vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months or whenever visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, Louisiana DEQ. [LAC 33:III.501.C.6]
- 90 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Operate the baghouse with control efficiency of 99.9% for nickel impregnated particles determined as MACT. The baghouses shall be maintained and operated properly. The filter elements (bags) shall be inspected every six months or whenever the visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. [LAC 33:III.5109.A]

### EQT125 6764 Fugitive Dust Baghouse

- 91 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 92 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 93 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 94 Baghouses: Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 95 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]
- Which Months: All Year Statistical Basis: None specified
- 96 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 97 The baghouse shall be maintained and operated properly and all the emission vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months or whenever visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, Louisiana DEQ. [LAC 33:III.501.C.6]
- 98 Submit CAM plan to LDEQ and EPA. Comply with the all applicable requirements of 40 CFR Part 64. [40 CFR 64]

### GRP003 Davison Catalyst

- 99 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1103]
- 100 Outdoor burning of waste material or other combustible material is prohibited. [LAC 33:III.1109.B]
- 101 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]

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### GRP003 Davison Catalyst

- 102 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 103 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]
- 104 Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited. [LAC 33:III.2901.D]
- 105 If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G. [LAC 33:III.2901.F]
- 106 Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HRVOC), which include 1,3-Butadiene, Butene, cis-2-Butene, trans-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only). [LAC 33:III.501.C.6]
- 107 Carbon monoxide  $\leq$  329.64 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 108 Nitrogen oxides  $\leq$  799.41 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 109 Particulate matter (10 microns or less)  $\leq$  532.98 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 110 VOC, Total  $\leq$  10.05 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 111 Chlorine  $\leq$  1.44 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 112 Sulfur dioxide  $\leq$  1.20 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 113 Ammonia  $\leq$  224.55 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 114 Cobalt compounds  $\leq$  0.33 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 115 Nickel (and compounds)  $\leq$  0.52 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 116 Hydrazine  $\leq$  0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 117 Hydrochloric acid  $\leq$  83.40 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 118 Nitric acid  $\leq$  0.01 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 119 Zinc (and compounds)  $\leq$  0.09 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 120 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard. [LAC 33:III.5105.A.1]

## SPECIFIC REQUIREMENTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

### GRP003 Davison Catalyst

- 121 Do not cause a violation of any ambient air standard listed in LAC 33:III. Table 51.2, unless operating in accordance with LAC 33:III.5109. [LAC 33:III.5105.A.2]
- 122 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. [LAC 33:III.5105.A.3]
- 123 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A. [LAC 33:III.5105.A.4]
- 124 Submit Annual Emissions Report (TED): Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3. [LAC 33:III.5107.A.2]
- 125 Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations" [LAC 33:III.5107.A.3]
- 126 Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property). [LAC 33:III.5107.B.1]
- 127 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923. [LAC 33:III.5107.B.2]
- 128 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.5107.B.3
- 129 Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through viii. [LAC 33:III.5107.B.4]
- 130 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge. [LAC 33:III.5107.B.5]
- 131 Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology. [LAC 33:III.5109.B.3]
- 132 Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2. [LAC 33:III.5109.B]
- 133 Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department. [LAC 33:III.5109.C]
- 134 Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. [LAC 33:III.5111.A]

## SPECIFIC REQUIREMENTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

Permit Number: 0520-00001-V9

Air - Title V Regular Permit Renewal

### GRP003 Davison Catalyst

- 135 Submit notification in writing: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up. [LAC 33:III.5113.A.1]
- 136 Submit notification in writing: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source. [LAC 33:III.5113.A.2]
- 137 Submit initial emissions inventory report: Due to the Department of Environmental Quality on or before October 1, 1994. Submit on a form or in an electronic format specified by the department and include the information specified in LAC 33:III.5307.A.1 through 7. [LAC 33:III.5307.A]
- 138 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 1st of July to the Department of Environmental Quality, Office of Environmental Services, Air Permits Division. Include the information in LAC 33:III.5307.A for the preceding calendar year. [LAC 33:III.5307.B]
- 139 Activate the planned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert. [LAC 33:III.5609.A.1.b]
- 140 Activate the planned strategy listed in LAC 33:III.5611.Table 6 when the administrative authority declares an Air Pollution Warning. [LAC 33:III.5609.A.2.b]
- 141 Activate the planned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency. [LAC 33:III.5609.A.3.b]
- 142 Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7. [LAC 33:III.5609.A]
- 143 Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority. [LAC 33:III.5611.A]
- 144 During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations. [LAC 33:III.5611.B]
- 145 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901. [LAC 33:III.5901.A]
- 146 Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur. [LAC 33:III.5907]
- 147 Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate. [LAC 33:III.5911.C]
- 148 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 149 All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]
- 150 All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A. [40 CFR 61]
- 151 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A. [40 CFR 63]
- 152 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 153 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]

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AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

Activity Number: PER20060005

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Air - Title V Regular Permit Renewal

### GRP003 Davison Catalyst

- 154 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 155 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 156 Davison Catalysts shall secure one allowance for each ton of SO<sub>2</sub> emitted per year. At the end of the year, each used allowance is retired and cannot be used again. EPA will record allowance transfers that are used for compliance and ensure that Davison Catalysts's emissions do not exceed the number of allowances it holds via the Allowance Tracking System (ATS). See Subparts C & D of part 73. [40 CFR 72.9(c)(1)(i)]
- 157 Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B. [40 CFR 82.Subpart F]

### GRP004 Dryers, Coolers and Furnaces

- 158 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 159 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]
- 160 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]

### GRP005 Steam Boilers

- 161 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]
- Which Months: All Year Statistical Basis: None specified
- 162 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 163 Sulfur dioxide <= 2000 ppmv at standard conditions. [LAC 33:III.1503.C]
- Which Months: All Year Statistical Basis: Three-hour average
- 164 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

## SPECIFIC REQUIREMENTS

AI ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility

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Air - Title V Regular Permit Renewal

### GRP005      **Steam Boilers**

165 These steam boilers are classified as "existing large and limited use gaseous fuel units" and subject to only the initial notification requirements in 40 CFR 63.9(b) (i.e., they are not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in subpart A of this part). [40 CFR 63.7506(b)]

### GRP006      **Dust Control Equipment**

166 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year      Statistical Basis: Six-minute average

167 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

168 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

169 Baghouses: Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

170 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

171 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

### GRP007      **Baghouses**

172 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year      Statistical Basis: Six-minute average

173 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

174 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

175 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]

Which Months: All Year      Statistical Basis: None specified

176 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

### GRP008      **Dust Collectors and Baghouses**

**SPECIFIC REQUIREMENTS**

**AJ ID: 1251 - W R Grace & Co - Conn - Davison Div Lake Charles Facility**

**Activity Number: PER20060005**

**Permit Number: 0520-00001-V9**

**Air - Title V Regular Permit Renewal**

**GRP008     **Dust Collectors and Baghouses****

- 177 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year     Statistical Basis: Six-minute average
- 178 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]  
Which Months: All Year     Statistical Basis: None specified
- 179 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 180 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]  
Which Months: All Year     Statistical Basis: None specified
- 181 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 182 Submit CAM plan to LDEQ and EPA. Comply with the all applicable requirements of 40 CFR Part 64. [40 CFR 64]

**GRP009     **Emergency vents and Stacks****

- 186 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year     Statistical Basis: Six-minute average

**GRP010     **Cooling Towers****

- 184 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]  
Which Months: All Year     Statistical Basis: Six-minute average

**GRP011     **Boilers****

- 185 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1101.B]  
Which Months: All Year     Statistical Basis: None specified
- 186 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year     Statistical Basis: Six-minute average
- 187 Sulfur dioxide <= 2000 ppmv at standard conditions. [LAC 33:III.1503.C]  
Which Months: All Year     Statistical Basis: Three-hour average
- 188 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III. Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]

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### GRP011 Boilers

- 189 Submit notification: Due as specified in 40 CFR 60.7. Submit the date of construction or reconstruction, anticipated startup, and actual startup. Include the information specified in 40 CFR 60.48c(a)(1) through (a)(4) as applicable. Subpart Dc. [40 CFR 60.48c(a)]
- 190 The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month. [40 CFR 60.48c(g)]
- 191 Maintain all records required under 40 CFR 60.48c for a period of 2 years following the date of such record. Subpart Dc. [40 CFR 60.48c(i)]
- 192 These steam boilers are classified as "existing large and limited use gaseous fuel units" and subject to only the initial notification requirements in 40 CFR 63.9(b) (i.e., they are not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in subpart A of this part). [40 CFR 63.7506(b)]

### GRP012 Scrubber and Absorbers

- 193 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 194 Sulfur dioxide  $\leq$  2000 ppmv at standard conditions. [LAC 33:III.1503.C]
- Which Months: All Year Statistical Basis: Three-hour average
- 195 Permittee shall monitor and record opacity weekly using Method 9. Permittee shall also conduct daily visual inspection on all baghouses and bin vents for plume detection. If a noticeable plume is detected, within three (3) days, a certified Method 9 reader shall be called upon to determine opacity. Corrective action must be taken if opacity exceeds 10%. Permittee shall have a Preventive Maintenance Program to ensure integrity of the baghouses. Records of all weekly Method 9 opacity readings and documents showing any opacity readings on all baghouses and bin vents where corrective action was required shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, LDEQ. [LAC 33:III.501.C.6]
- 196 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

### GRP013 Scrubbers

- 197 Operate according to the manufacture's operation parameters to ensure the control efficiency. [LAC 33:III.501.C.6]
- 198 MACT is not required since only Class III TAPs are emitted. [LAC 33:III.5109]

### RLP004 11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse

- 199 Opacity  $\leq$  20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]
- Which Months: All Year Statistical Basis: Six-minute average
- 200 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 201 Submit notification: Due at least 30 days prior to performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing. [LAC 33:III.501.C.6]

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### RLP004 11-96 - 7767 Stack for 6769 SCR & 6764 Fugitive Baghouse

- 202 Filter vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 203 Filter vents: Visible emissions recordkeeping by electronic or hard copy daily. Keep records of visible emission checks on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 204 Baghouses: Equipment/operational data monitored by technically sound method semiannually or whenever visible emission checks indicate maintenance may be necessary. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 205 Baghouses: Equipment/operational data monitored by technically sound method upon each occurrence of process unit shut down or whenever visible emission checks indicate maintenance may be necessary. Change elements as necessary. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
- 206 Baghouses: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 207 The baghouse shall be maintained and operated properly and all the emission vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months or whenever visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division, Louisiana DEQ. [LAC 33:III.501.C.6]
- 208 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 209 The NOx CEM shall be calibrated in accordance with the NSPS Appendix F and the calibration results shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. State Only. [LAC 33:III.501.C.6]
- 210 Comply with the requirements of PSD-LA-610. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-610. [LAC 33:III.509]
- 211 A continuous analyzer shall be installed, maintained, and calibrated to provide a continuous record of NOx concentration in the stack gas from this emission point. This analyzer shall comply with applicable provisions of performance specification 2, 40 CFR 60, Appendix B. (PSD-LA-610). [LAC 33:III.509]
- 212 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Operate the baghouse with control efficiency of 99.9% for nickle impregnated particles determined as MACT. The baghouses shall be maintained and operated properly. The filter elements (bags) shall be inspected every six months or whenever the visual checks indicate maintenance may be necessary. The filter elements shall be changed as necessary. [LAC 33:III.5109]
- 213 Submit CAM plan to LDEQ and EPA. Comply with the all applicable requirements of 40 CFR Part 64. [40 CFR 64]